FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 1837

DATE FILMED 4/25/89 CAMERA NO. 3

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MUR 1837 initially involved approximately 170 respondents. The Commission entered into Conciliation Agreements with three, i.e., the Friends of Phil Gramm and Donald White as Treasurer; KWTX Broadcasting Company; and M.N. Bostick.

In March, 1985, the Commission either found "No Reason to Believe" or voted to take "No Further Action" with respect to all other respondents.

Documents pertaining to the three respondents with whom the Commission conciliated are contained in the main body of this file. Documents filed by, or relating to, all other respondents are not included in the body of this file but appear in various Annexes, as follows:

A. Letters notifying respondents that a complaint had been filed with the FEC.

B. Designations of Counsel filed by respondents.

C. Responses to the complaint.

D. Letters advising respondents that the Commission had found No Reason to Believe or had voted to take No Further Action with respect to them.

E. Letters advising respondents that the entire matter had been closed.

For additional information pertaining to the litigation associated with this case, see Friends of Phil Gramm et al. v. Federal Election Commission, C.A. No. 3-85-1164-F (N.D. Tex.) and Federal Election Commission v. Friends of Phil Gramm et al., C.A. No. 3-85-1507-F (N.D. Tex.).

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COMPLAINT

TO THE FEDERAL ELECTION COMMISSION:

COMES NOW, Donna Mobley (hereinafter "Complaintant") pursuant to 2 U.S.C. §437, and files this Complaint against Phil Gramm, Ruth Cymber, John Baxter, the American Bankers Association PAC, the American Family PAC, the United Pacific Fund, the National Federation of Independent Business PAC, Houston Industries PAC, the Tenneco Employees PAC, National Home Builders PAC, and the Texas Republican Congressional Club (hereinafter "Violating PAC's") and would respectfully show the Commission the following:

I.

Donna Mobley is a natural person residing in Austin, Texas. Phil Gramm is a candidate for the U.S. Senate, Ruth Cymber is the Assistant Treasurer of Friends of Phil Gramm (the principal committee for the Gramm campaign) and John Baxter is the Treasurer of the Friends of Phil Gramm. The American Bankers Association, the American Family PAC, the United Pacific Fund, The National Federation of Independent Business PAC, the Houston Industries PAC, the Tenneco Employees PAC, the National Home Builders PAC and the Texas Republican Congressional Club are all "political committees" under the federal election laws.

II.

On or about July 13, 1984, the Friends of Phil Gramm (the principal committee for the Phil Gramm campaign) filed its July 15 quarterly report. This report, which was filed 69 days after the May 5th Republican primary, certified that there were no debts or obligations owed by the Gramm campaign as a result of the Republican primary election. A copy of the summary page of that report is attached as Exhibit 1. No schedule of Debts and Obligations owed by the Committee (Schedule D) was included in that report. In the

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weeks after the primary, Phil Gramm bragged repeatedly that his campaign was "in the black with money in the bank." A copy of an article from the July 15, 1984 issue of the Tyler Telegraph is attached as Exhibit 2.

III.

On October 24, 1984, the Fort Worth Star Telegram published a story indicating that from July 1, 1984, to September 30, 1984, the Phil Gramm campaign accepted more than $110,000 in contributions designated for the "primary" election from individuals who had also contributed $1,000 to the "general" election during that period of time. Federal election law limits individual contributions to $1,000 per election and political action committee contributions to $5,000 per election. A copy of the article from the Fort Worth Star Telegram is enclosed as Exhibit 3.

My review of Phil Gramm's Federal Election Commission reports of July 15, 1984, October 15, 1984, and twelve days preceeding the election reveal that at least 163 individuals and at least 8 PAC's have contributed more than $150,000 above the legal limits to the Gramm campaign after the May 5 primary. A copy of the entries from the Gramm reports for those individuals and PAC's who have given the Gramm campaign more than the respective $1,000 and $5,000 contribution limits since May 5, 1984 is enclosed as Exhibit 4.

IV.

After the Star Telegram revelations, Gramm claimed that he did have a primary debt after all. (See Exhibit 5.) As mentioned above, the July 15th report noted no debts or obligations, nor did the Gramm F.E.C. reports of October 15, 1984 and twelve days preceding the election (Exhibits 6 and 7 respectively.) None of these reports indicated any payments or outstanding balances for any debts or obligations owed by the Gramm campaign. Attached as Exhibit 8 is the page from the official F.E.C. Guide for Congressional Candidates which

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states that all obligations or accounts of a campaign which are unpaid at the end of a reporting period must be disclosed in the F.E.C. report for that period. At no point has the Gramm campaign itemized any unpaid or outstanding primary election bills or obligations nor has Gramm shown any repayment of such debts or obligations.

V.

Gramm's acceptance of the contributions listed in Exhibit 4, constitutes a violation of the contribution limitations of the federal election laws and in particular violates 11 C.F.R. §§ 110.1,110.2, and 110.9 (Exhibits 9 and 10). Phil Gramm, his treasurer and assistant treasurer are legally responsible for these violations. The violating PAC's, who regularly receive information from the F.E.C. concerning the federal election laws, are also in violation of §110.2.

VI.

Complaintant would show the Commission that these violations were made willfully. Section 110.1 states that contributions designated for a primary "shall" be made only to the extent of outstanding primary debts. Gramm has never shown any primary debts as outstanding in his F.E.C. filings. Moreover, Gramm bragged that he had ended the primary in the black. Moreover, there is a pattern of illegal contributions. After May 5, 1984, many of the individuals listed in Exhibit 4 contributed $2,000 at one time, when the Gramm campaign showed it had no primary debts.

VII.

Without waiving the above, Complaintant would show in the alternative, if, contrary to the Gramm certified F.E.C. reports, and the Gramm statements of July of this year, Gramm did have a primary debt June 30, 1984, Gramm, his treasurer, and assistant treasurer did knowingly and willfully violate the Federal election laws by not reporting debts and obligations. Section 104.3 (Exhibit 11)

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requires candidates to disclose and itemize the outstanding debts and obligations owed by their campaigns at the end of each reporting period. As stated above, Gramm has never disclosed any outstanding debts nor the repayment of any such debts.

VIII.

Gramm's explanation that he did not have to show a primary debt because "We had a primary debt, but we had a balance in the general election account larger than the primary," (Exhibit 12) is both legally and factually erroneous. First, of course, the law required Gramm to itemize to whom and how much he owed money on June 30, 1984. Gramm failed to do so. In addition, Gramm showed in his July 15 report cash on hand of only $39,259.43. If the most recent Gramm story is to be believed, he had in excess of a quarter of a million dollars ($250,000) in primary debt on June 30, 1984. No matter what Gramm claims, $39,000 is less than $250,000.

IX.

If the section of the campaign laws that Gramm violated was Section 104.3, that violation by Gramm was clearly willful. If Gramm owed primary debts, the primary "debts" that Gramm failed to report but later paid were mostly to two entities, P/M Consulting ($177,400) and Karl Rove and Company ($16,886.52). Both of these entities were a vital part of the Gramm campaign. The Gramm campaign had to know of these large unpaid obligations. If Gramm had primary debts on June 30, Gramm willfully misrepresented the facts and failed to report these debts contrary to §104.3.

X.

Since the Gramm campaign on October 17, 1984, was previously found guilty of violating the F.E.C. laws by illegally pirating campaign lists, (Exhibit 13), complaintant requests the Commission to impose a maximum civil penalty of 200% of the amount of the Gramm violation.

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XI.

In addition to these violations, Gramm has violated the contribution limitations by taking more than the legal limits for either the primary or the general elections. Those violating contributors, dates of contributions, and designated elections are:

Tenneco Employees Good Government Fund

General	6/18/84	$1000
General	7/2/84	$1000
General	8/21/84	$1000
General	9/14/84	$1000
General	10/10/84	$1000
General	10/9/84	$4000

Hamilton Industries PAC

Primary	5/3/84	$5000
Primary	11/14/84	$ 500

National Homebuilders PAC

General	9/20/84	$ 500
General	10/12/84	$5000

David Crowley

Primary	5/9/84	$1000
Primary	9/24/84	$1000

John Stemmons, Jr.

Primary	9/24/84	$1000
Primary	10/9/84	$1000

There can be no doubt that each of these violations violate §110.1,110.2, and §110.9 and were done knowingly and willfully.

WHEREFORE, PREMISES CONSIDERED, Complaintant prays that the Commission set this matter for hearing at the earliest possible date, that the above named violators be ordered to appear at the hearing, that complaintant be given an opportunity to appear and present evidence, and that upon hearing that Phil Gramm, John Baxter, Ruth Cynders, the American Bankers Association PAC, the American Family PAC, the United Pacific Fund, the National Federation of Independent Business PAC, the National Home Builders PAC, the Tenneco Employees PAC, the Houston Industries PAC, and the Texas Republican Congressional Club be assessed a civil penalty of 200% of the amounts each has violated the federal election laws.

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Donna Mobley
DONNA MOBLEY

SWORN TO AND SUBSCRIBED BEFORE ME on the 29 day of October, 1984.

Janie M Evans
NOTARY PUBLIC in and for the
State of Texas

JANIE M EVANS
(Print name of Notary Public here)

My Commission Expires: 7-4-88

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SUMMARY OF COMPLAINT

July 13, 1984 — Phil Gramm certifies he has no debt from the May 5 Republican Primary

July 15, 1984 — After filing his F.E.C. report, Phil Gramm brags his campaign is "in the black" with no debt.

October 24, 1984 — After the Fort Worth Star Telegram reveals that Gramm has apparently taken illegal contributions, Gramm claims he did have a debt, after all, of one-quarter of a million dollars ($250,000).

To accept Gramm's view one would have to believe:

(1) that 69 days after the primary, Phil Gramm did not know his campaign had unpaid bills of one-quarter of a million dollars ($250,000) and;

(2) that no one ever sent Gramm a bill or otherwise informed him that he owed them one-quarter of a million dollars ($250,000).

A fair reading, of the facts and statements, is that Phil Gramm has violated the federal election laws in order to get more special interest money from PAC's and large contributors by accepting contributions above the legal limits and/or by willfully failing to disclose campaign debts.

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was being destroyed by the [illegible] beach traffic, which added to er[illegible]n

Huffman says the city decided that because it could not afford the extra police required to patrol the beaches and could no longer ignore the erosion, its city council in 1978 adopted an ordinance to prohibit driving on beaches except to park.

Since then, the city has been trying to plan parkin, along the beaches to allow for a free parki. g area that would be no more than half a n .le from the beach.

Gramm Tells Tyler Area Voter They Have A Clear Choice

TYLER MORNING TELEGRAPH
By DAVID LEARY
Staff Writer
JUL 1 5 1984

Republican U.S. Senate nominee Phil Gramm reiterated to Tyler-area supporters Saturday his belief that Texas voters have a clear choice between liberal and conservative values in the upcoming November Senate election.

"We're down to a clear philosophical choice," Gramm said at a press conference following a fundraiser at the S. Broadway Ramada Inn. "This race is clearly divided between liberal and conservative."

The conservative congressman was making a campaign swing through East Texas, concentrating on the small towns and rural areas he hopes to draw support from in November.

Gramm, who will face off against Democrat Lloyd Doggett to fill the Senate seat being vacated by Sen. John Tower, said he wants to hold down government spending, build a stronger defense and send the working people of Texas home with more money in their pockets, measures he said Doggett opposes.

"My oppenent runs around saying President Reagan and I are ruining the economy, but that's just not the case," Gramm said.

Gramm pointed to recently released economic figures which show inflation growing at an annual rate of only 2.8 percent, retail sales and industrial production growing and civilian unemployment down to 7.1 percent.

Gramm also emphasized the importance of East Texas to his campaign, saying he hopes to garner support no other Republican candidate has been able to muster in this predominantly Democratic area.

Gramm said the support he has received in the East Texas area has been surprisingly strong, especially the financial backing.

"I'm running this campaign in the black with money in the bank," he said.

When asked to comment on Walter Mondale's selection of Geraldine Ferraro as his vice presidential running mate, Gramm said he knew her well and was personally happy for her. But the bottom line for voters will not be whether to vote for a man or woman, but to vote for the person who will make the best vice president.

"Of course, George Bush has a little more to work with running beside President Reagan than Ferraro does with Walter Mondale," Gramm said with a smile.

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Exh - 2

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REPORTS OF RECEIPTS AND DISBURSEMENTS

For Authorized Committee

(Summary Page)

ALIGN AREA | ALIGN AREA

1 Name of Committee (in Full)
Friends of Phil Gramm

2 FEC Identification Number
C00170712

JUL 17 1984

Address (Number and Street)
Drawer AO

3. Is this Report an Amendment?
☐ YES ☒ NO

City, State and Zip Code
College Station, TX 77840

☐ Check if address is different than previously reported.

4. TYPE OF REPORT

- ☐ 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)
- ☐ 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

This report contains activity for – ☒ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period April 16, 1984 through June 30, 1984		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	1,427,492.52	2,257,126.67
(b) Total Contribution Refunds (from Line 20 (d))	765.00	1,050.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	1,426,727.52	2,256,076.67
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	1,608,310.81	3,434,055.11
(b) Total Offsets to Operating Expenditures (from Line 14)	11,017.27	11,017.27
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	1,597,293.54	3,423,037.84
8. Cash on Hand at Close of Reporting Period (from Line 27)	39,259.43	
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)		

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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

Ruth Cymber
Type or Print Name of Treasurer

Assistant Treasurer

SIGNATURE OF TREASURER

7/13/84
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 3 (3/80)

Exhibit 4

Fort Worth Star-Telegram

Wednesday, October 24, 1984 ★ ★ ★

PRICE 25¢

[FRONT PAGE]

U.S. REP. PHIL GRAMM
... took late contributions

Gramm contributions raise questions

Continued from Page 1

of the law."

Neal said that if an examination shows "we have a bookkeeping problem, a brief amended report will be filed to differentiate the primary and general election accounts."

Federal law allows individual contributions of $1,000 and political action committee contributions of $5,000 to each election a candidate faces: potentially a primary, a runoff and a general election.

A contribution may be designated for a primary or runoff after they are over, but the money can be used only to pay debts remaining from the primary or runoff.

When there is no debt, donations for the primary and runoff must be returned to the contributor. If they are not, the Federal Election Commission can pursue civil penalties against both the contributor and the campaign.

Gramm's campaign report covering the end of the primary — and the days following through June 30 — showed he had no debt and that he had $39,250 in cash remaining. The College Station congressman faced no runoff election.

Yet, in his report covering July 1 to Sept. 30, Gramm showed he took more than $110,000 in Republican primary contributions from 108 individuals and five political action committees.

Many of the individuals made the maximum contribution to the primary campaign on the same date they made the maximum contribution to Gramm's general election, the report shows.

Gramm has showed off his primary campaign report as a sign of his fiscal responsibility.

"I'm running this campaign in the black with money in the bank," Gramm said after the primary campaign report was released.

However, the most recent report showed that Gramm paid more than $241,000 in primary campaign bills after the June 30 report, which had left blank the line designated for "debts and obligations owed."

One bill was paid two days after the primary election reporting period ended. All told, Gramm paid P/M Consulting $214,400 for primary campaign fund-raising expenses between July 2 and Sept. 28. He paid the company a general election campaign bill of $5,000 as early as July 16.

Gramm outspent his Democratic opponent, Austin state Sen. Lloyd Doggett, almost 3-1 during the latest reporting period. Gramm spent $3.1 million, and Doggett spent $851,238.

Doggett has a campaign debt of $98,000 from the primary campaign. His latest report showed he has outstanding obligations of $319,014.

Gramm and Doggett are vying for the U.S. Senate seat being vacated by retiring Republican John Tower.

Federal Election Commission spokesman Fred Eiland said U.S. law is clear on primary campaign contributions made after the election.

"If a campaign ends up without debt any contributions that were sent for the primary have to be returned to the contributor," Eiland said. "It's a violation for the one making it the contributor as the one receiving it."

Eiland said that if the contributor and the candidate inadvertently violated the law, they are liable for civil penalites up to $5,000 or the amount of the violation, whichever is greater. If the violation was made intentionally, he said, the civil penalty can go as high as $10,000 or 200 percent of the violation.

Eiland said no candidate in the United States has faced any criminal action for violation of the primary election contribution law since the FEC was formed in 1975.

Any debts that are realized after a primary campaign reporting period end and any contributions made toward the debt must be shown in an amended version of the original report, Eiland said.

Gramm has filed no amended report for the primary.

Two of those giving Gramm late primary campaign contributions are L.D. Brisman of Kerrville and Walter Mischer of Houston. Brisman was Bob Krueger's finance chairman during the Democratic U.S. Senate primary, and Mischer was a top fund raiser for U.S. Rep. Kent Hance in that same election.

Please see Gramm on Page 8

Gramm's funding raises questions

● Gramm withdraws peace offer 1C

By H.G. BATCHELDER
Telegram Austin Bureau

AUSTIN — Republican U.S. Senate candidate Phil Gramm's campaign may have violated federal election laws by accepting more than $110,000 in primary election campaign contributions long after the May 5 primary.

The late primary campaign contributions would be legal only if they went toward paying a primary campaign debt. Gramm's report for the period ending June 30 showed no debt, but he has since reported paying more than $214,000 in campaign bills from the May 5 primary.

When questioned about the possible discrepancy, Gramm spokesman Larry Neal said, "We have contacted our attorney, one of the foremost election law experts in the country, who assures us that today's allegations are fundamentally nonsense.

"We have maintained two accounts — one for the primary election and another for the general election — paying bills from each as appropriate and as those bills arrived," Neal said. "We are still receiving bills from the primary election campaign.

"We have, however, reported fully and accurately our campaign disbursements and contributions on a consolidated basis. We are assured that our reporting procedures are well within the spirit and the scope

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VIOLATION (EXCEEDING $1000.00) A1

(name and address)	(employer and occupation)	(date)	
Mrs. Margaret Alkek 3011 N. Main Victoria, TX 77901	Housewife	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Margaret Alkek 3011 N. Main Victoria, TX 77901	Housewife	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Alvis Arthur 1711 N. Beltline Road P. O. Box 153648 Irving, TX 75015		9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Alvis Arthur 1711 N. Beltline Road P. O. Box 153648 Irving, TX 75015		9/24/84	$1,000.00
Received For GENERAL Election	Aggrega 2000		

(name and address)	(employer and occupation)	(date)	
Mr. James W. Arnold P. O. Box 6566 Tyler, TX 75711	Self-employed	7/23/84	$100.00
	Oil Drilling Contr		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,700.00	

(name and address)	(employer and occupation)	(date)	
Mr. James W. Arnold P. O. Box 6566 Tyler, TX 75711	Self-employed	7/24/84	$1,000.00
	Oil Drilling Contr		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,700.00	

(name and address)	(employer and occupation)	(date)	
Dr. William L. Anderson P.O. Box 539 Addison, TX 75001	Self-Employed	7/25/84	$100.00
	Physician		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,300.00	

(name and address)	(employer and occupation)	(date)	
Dr. William L. Anderson P.O. Box 539 Addison, TX 75001	Self-Employed	9/24/84	$1,000.00
	Physician		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,300.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Helen Allen 3207 Groveland Lane Houston, TX 77019		8/09/84	$1,000.00
	Housewife		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Helen Allen 3207 Groveland Lane Houston, TX 77019		8/09/84	$1,000.00
	Housewife		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. C.J. Allen P.O. Box 3902 Bryan, TX 77805	Allen Olds, Cadillac, & Honda	9/06/84 9/07/84	$50.00 $50.00
	Owner		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,600.00	

(name and address)	(employer and occupation)	(date)	
Mr. C.J. Allen P.O. Box 3902	Allen Olds, Cadillac, & Honda	9/06/84	$1,000.00

E.L. # 11

VIOLATIONS EXCEEDING $1000.00

(name and address)	(employer and occupation)	(date)	
Mr. Roland Arthur 1711 North Beltline Road Irving, TX 75015	Arthur Equipment	9/24/84	$1,000.00
	Owner		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
[illegible] [illegible] North Beltline Road Irving, TX 75015		9/24/84	$1,000.00
Received For (PRIMARY) Election	Aggregate Year-To-Date:	$1,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Ebby Halliday 5999 West Northwest Hwy. Dallas, TX 75225	Ebby Halliday Realtors	8/14/84	$1,000.00
	President		
Received For GENERAL Election	Aggregate Year-To-Date:	$2000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Ebby Halliday Acers 5999 W. Northwest Highway Dallas, TX 75225	Ebby Halliday Realtors	9/24/84	$1,000.00
	President		
Received For (PRIMARY) Election	Aggregate Year-To-Date:	$1000.00	

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(name and address)	(employer and occupation)	(date)	
Mrs. Ebby Halliday Acers 5999 W. Northwest Highway Dallas, TX 75225	Ebby Halliday Realtors	9/24/84	$1,000.00
	President		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

VIOLATION

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B

Violations Exceeding $1000

©

(name and address)	(employer and occupation)	(date)	
Mrs. Helen Benkston 4747 LBJ Freeway Dallas, TX 75234		9/24/84	$1,000.00
Received For PRIMARY Election	Housewife		
	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Helen Benkston 4747 LBJ Freeway Dallas, TX 75234		9/24/84	$1,000.00
Received For GENERAL Election	Housewife		
	Aggregate Year-To-Date:	$2,000.00	

Mr. Louis A. Beecherl, Jr. 3801 Beverly Drive Dallas, TX 75205	Texas Oil & Gas	9/24/84	$1,000.00
Received For GENERAL Election	Executive		
	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. Louis A. Beecherl, Jr. 3801 Beverly Drive Dallas, TX 75205	Self-Employed	9/24/84	$1,000.00
Received For GENERAL Election	Investor		
	Aggregate Year-To-Date:	$1,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. D. Phil Bolin 510 Hamilton Building Wichita Falls, TX 76301	Eagle Oil & Gas	9/27/84	$1,000.00
Received For GENERAL Election	Oil Operator		
(name and address)	Aggregate Year-To-Date:	$1,500.00	
(name and address)	(employer and occupation)	(date)	
Mr. D. Phil Bolin 510 Hamilton Building Wichita Falls, TX 76301	Eagle Oil & Gas	9/27/84	$500.00
Received For PRIMARY Election	Oil Operator		
	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	
Mr. O. E. Brand P. O. Box 1840 McAllen, TX 78501	Griffin and Brand	8/23/84	$1,000.00
Received For PRIMARY Election	Produce Business		
	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. O. E. Brand P. O. Box 1840 McAllen, TX 78501	Griffin and Brand	8/23/84	$1,000.00
Received For GENERAL Election	Produce Business		
	Aggregate Year-To-Date:	$2,000.00	

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BIG - Violations exc. $100

(2)

(name and address)	(employer and occupation)	(date)	
Mr. L. D. Brinkman 2123 Sidney Baker Street Kerrville, TX 78028	L. D. Brinkman Carpet Co. President	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. L. D. Brinkman 2123 Sidney Baker Street Kerrville, TX 78028	L. D. Brinkman Carpet Co. President	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. L. D. Brinkman 2123 Sidney Baker Street Kerrville, TX 78028	Housewife	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. L. D. Brinkman 2123 Sidney Baker Street Kerrville, TX 78028	Housewife	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. B. G. Brookshire P. O. Box 1411 Tyler, TX 75701	Brookshire Grocery Owner	7/24/84	$1000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1000.00	

(name and address)	(employer and occupation)	(date)	
Mr. B. G. Brookshire P. O. Box 1411 Tyler, TX 75701	Brookshire Grocery Owner	7/23/84	$100.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,100.00	

(name and address)	(employer and occupation)	(date)	
Mr. William E. Burford 1400 Main Street Dallas, TX 75202	Texas Art Gallery President	8/23/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

Mr. William E. Burford 1400 Main Street Dallas, TX 75202	Texas Art Gallery President	8/23/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1,000.00	
(name and address)	(employer and occupation)	(date)	

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B's -- Violations exc. $1000 (3)

(name and address)	(employer and occupation)	(date)	
Mr. L. D. Burns One Parker Square Suite #500 Wichita Falls, TX 00817	L. D. Burns Drilling Owner	8/15/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. L. D. Burns One Parker Square #500 Wichita Falls, TX 76308		8/23/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,000.00	

Mr. George W. Bush 17630 Davenport Road Dallas, TX 75252	George W. Bush Co. Real Estate Dev.	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. George W. Bush 17630 Davenport Road Dallas, TX 75252	George W. Bush Co. Real Estate Dev.	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

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B MAJOR VIOLATIONS (over $1000.00)

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name and address) rs. Elloine M. Calder 265 Hartford Building allas, TX 75201	(employer and occupation)	(date) 9/24/84	$1,000.00
	Housewife		
eceived For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
rs. Elloine M. Calder 265 Hartford Building allas, TX 75201	(employer and occupation)	(date) 9/24/84	$1,000.00
	Housewife		
eceived For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
name and address) r. Bruce Calder 200 Hartford Building allas, TX 75201	(employer and occupation) Self-Employed	(date) 9/24/84	$1,000.00
	Investments		
eceived For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
name and address) r. Bruce Calder 200 Hartford Building allas, TX 75201	(employer and occupation) Self-Employed	(date) 9/24/84	$1,000.00
	Investments		
eceived For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
r. Arthur Cary 2519 Farrington Dallas, TX 75207	(employer and occupation) Cary Products Co.	(date) 9/24/84	$1,000.00
	Engineer		
eceived For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
name and address)	(employer and occupation)	(date)	
(name and address) Mr. Arthur Cary 2519 Farrington Dallas, TX 75207	(employer and occupation) Cary Products Co.	(date) 7/23/84	$500.00
	Engineer		
eceived For PRIMARY Election	Aggregate Year-To-Date:	1000.00	
(name and address) Mr. Gene Canavan P. O. Box 16007 San Antonio, TX 78216	(employer and occupation) self employed	(date) 7/17/84	$1,000.00
	investments		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,000.00	
(name and address) Mr. Gene F. Canavan P. O. Box 16007 San Antonio, TX 78216	(employer and occupation) Self-Employed	(date) 7/17/84	$1,000.00
	Real Estate Dev.		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	
(name and address)	(employer and occupation)	(date)	
(name and address) Mr. Donald M. Carlton 4601 Cat Mountain Dr. Austin, TX 78731	(employer and occupation) Financo, Inc.	(date) 8/02/84	$100.00
	Financial Analyst		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,100.00	

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
r. Donald M. Carlton 601 Cat Mountain Dr. ustin, TX 78731	Financo, Inc.	7/12/84	$1000.00

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VIOLATIONS EXCEEDING $1000.00

(name and address) Mr. Frank Cass 2727 Routh Street Dallas, TX 75201	(employer and occupation)	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	
(name and address) Mr. Frank Cass 2727 Routh Street Dallas, TX 75201	(employer and occupation)	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. William G. Cass 2727 Routh Street Dallas, TX 75201	(employer and occupation) Cass Oil & Co. Executive	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. William G. Cass 2727 Routh Street Dallas, TX 75201	(employer and occupation) Cass Oil & Co. Executive	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Mary Cass 2727 Routh Street Dallas, TX 75201	(employer and occupation) Housewife	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Mary Cass 2727 Routh Street Dallas, TX 75201	(employer and occupation) Housewife	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. Michael L. Cass 2727 Routh Street Dallas, TX 75201	(employer and occupation) Cass Oil & Co. Partner	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. Michael L. Cass 2727 Routh Street Dallas, TX 75201	(employer and occupation) Cass Oil & Co. Partner	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

Mr. David Crowley 10265 Inwood Road Dallas, TX 75229	Name of Employer Home [redacted]ior & Gifts	Date (month, day, year) 5/9/84	$1000
☒ Primary ☐ General	Occupation Partner		
	Aggregate Year-to-Date—$	$1000	

Full Name, Mailing Address and ZIP Code Mr. Dave Crowley 10265 Inwood Road Dallas, TX 75229	Name of Employer Home Interiors [redacted]	Date (month, day, year) 6/5/84	Amount of Each Receipt This Period $1000
☒ General	Occupation partner		
	Aggregate Year-to-Date—$	$2000	

(name and address) Mr. David Crowley 10265 Inwood Road Dallas, TX 75229		9/24/84	$500.00
	Retired		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	

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VIOLATIONS EXCEEDING $1000.00

(name and address)	(employer and occupation)	(date)	
Mr. W. Allen Custard 3703 Crescent Ave. Dallas, TX 75205		9/20/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. W. Allen Custard 3703 Crescent Ave. Dallas, TX 75205	(employer and occupation)	(date) 9/20/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Dr. William H. Crain 2511 San Gabriel Austin, TX 78705	(employer and occupation) University of Texas at Austin Curator	(date) 7/25/84 8/27/84	$500.00 $500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Dr. William H. Crain 2511 San Gabriel Austin, TX 78705	(employer and occupation) University of Texas at Austin Curator	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. Roy C. Coffee 6201 Hillcrest Dallas, TX 75205	(employer and occupation) Coffee, Coffee, & Sharp Owner	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. Roy C. Coffee 6201 Hillcrest Dallas, TX 75205	(employer and occupation) Coffee, Coffee, & Sharp Owner	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

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Violations - EXCEEDING $1000 - D

(name and address) Mr. Joel Daniel P. O. Box 130 Llano, TX 78643	(employer and occupation) Peoples Savings & Loan President	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. Joel Daniel P. O. Box 130 Llano, TX 78643	(employer and occupation) Peoples Savings & Loar President	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address) Mr. Gilbert M. Denman, Jr. 535 San Antonio Bank & Trust Building San Antonio, TX 78205	(employer and occupation) Denman, Franklin, Denman Attorney	(date) 7/17/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. Gilbert M. Denman, Jr. 535 San Antonio Bank & Trust Building San Antonio, TX 78205	Aggregate Year-To-Date: (employer and occupation) Denman, Franklin, Denman Attorney	(date) 7/17/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	

(name and address) Mr. John W. Dixon 5065 Lakehill Court Dallas, TX 75220	(employer and occupation)	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. John W. Dixon 5065 Lakehill Court Dallas, TX 75220	(employer and occupation)	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address) Mr. Richard Doornbos P. O. Box 696 Nederland, TX 77627	(employer and occupation) C. Doornbos, Inc. Investments	(date) 9/26/84	$200.00
Received For PRIMARY Election	Aggregate Year-To-Date:	700.00	
(name and address) Mr. Richard Doornbos P. O. Box 696 Nederland, TX 77627	(employer and occupation) C. Doornbos, Inc. Investments	(date) 9/26/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,700.00	

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VIOLATIONS EXCEEDING $1000.00

(name and address)	(employer and occupation)	(date)	
Ms. Karen Edwards P. O. Box 2431 Big Spring, TX 79720		9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Ms. Karen Edwards P. O. Box 2431 Big Spring, TX 79720		9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Donald S. Elliott P. O. Box 6867 San Antonio, TX 78209	Retired	7/10/84	$50.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,150.00	

(name and address)	(employer and occupation)	(date)	
Mr. Donald S. Elliott P. O. Box 6867 San Antonio, TX 78209	Retired	7/17/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,150.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Sally Ende 9507 Harwin Dr. Houston, TX 77036		8/17/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Sally Ende 9507 Harwin Dr. Houston, TX 77036		8/17/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. William O. Ende 9507 Harwin Dr. Houston, TX 77036		8/17/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. William O. Ende 9507 Harwin Dr. Houston, TX 77036		8/17/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

Violation - 5

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VIOLATIONS EXCEEDING $1000.00

F Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Albert Fay, Jr. 99 N. Post Oak Ln. Houston, TX 77024	Occupation	8/30/84	$1000.00
Receipt For: ☒ Primary ☐ General ☐ Other (Specify)			
(Name and address) Mr. Albert B. Fay, Jr. [illegible] Houston Avenue Houston, TX 77007	(employer and occupation) self investments	(date) 9/13/84	$300.00
(Name and address) Mr. [illegible] Freeman [illegible] Glen Albens Dallas, TX 75225	(employer and occupation) -Information Requested-	(date) 04/30/84	(amount) $1,000.00
Received For: Primary Election	Aggregate year-to-date:	$1,000.00	
Mr. Jerry W. Freeman 7524 Glen Albens Dallas, TX 75225		(date) 9/24/84	$1,000.00
Received For: PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
Mr. Jerry W. Freeman 7524 Glen Albens Dallas, TX 75225		(date) 9/24/84	$1,000.00
Received For: GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

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Violation -+

EXCEEDING $1000.00

(name and address)	(employer and occupation)	(date)	
Mrs. Margaret Folsom 16475 Dallas Parkway Suite 800 Dallas, TX 75248		9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Margaret Folsom 16475 Dallas Parkway Suite 800 Dallas, TX 75248		7/11/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Robert S. Folsom 16475 Dallas Parkway Suite 800 Dallas, TX 75248		9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Robert S. Folsom 16475 Dallas Parkway Suite 800 Dallas, TX 75248		9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. R. L. Foree, Sr. 3300 InterFirst One Building Dallas, TX 75202	Self-Employed Investments	7/02/84	$500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	

(name and address)	(employer and occupation)	(date)	
Mr. R. L. Foree, Sr. 3300 InterFirst One Building Dallas, TX 75202	Self-Employed	8/15/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Wilton H. Fair P. O. Box 689 Tyler, TX 75710	Self-Employed Real Estate	7/23/84	$100.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,200.00	

(name and address)	(employer and occupation)	(date)	
Mr. Wilton H. Fair P. O. Box 689 Tyler, TX 75710	Self-Employed Real Estate	7/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,200.00	

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VIOLATI[illegible] G $100.

(name and address)	(employer and occupation)	(date)	
Mr. Frank Glover P.O Box 287 Mt. Pleasant, TX 75455	Glover Feed Mills, Inc. President	7/27/84	$100.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,100.00	

(name and address)	(employer and occupation)	(date)	
Mr. Frank Glover P.O Box 287 Mt. Pleasant, TX 75455	Glover Feed Mills, Inc. President	8/06/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,100.00	

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violation — $1000 - H

(name and address)	(employer and occupation)	(date)	
Mr. Thomas E. Martin 5905 Club Oaks Drive Dallas, TX 75248	Self-Employed	9/24/84	$1,000.00
	Real Estate		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Thomas E. Martin 5905 Club Oaks Drive Dallas, TX 75248	Self-Employed	9/24/84	$1,000.00
	Real Estate		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Hugh Halff, Jr. 3355 Cherry Ridge Road Suite 201 San Antonio, TX 78230	Conroy Boat Co.	7/17/84	$1,000.00
	Chairman of Board		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Hugh Halff, Jr. 3355 Cherry Ridge Road Suite 201 San Antonio, TX 78230	Conroy Boat Co.	7/17/84	$1,000.00
	Chairman of Board		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Willard H. Hammonds P. O. Box 6769 Corpus Christi, TX 78411		9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Willard H. Hammonds P. O. Box 6769 Corpus Christi, TX 78411		9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

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(name and address)	(employer and occupation)	(date)	
Mr. Paul K. Herder 4202 Hwy. 90 East San Antonio, TX 78219	Herder Truck Lines	7/13/84	$1,000.00
	Freight Lines		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Paul K. Herder 4202 Hwy. 90 East San Antonio, TX 78219	Herder Truck Lines	8/08/84	$1,000.00
	Freight Lines		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. H. Wendell Hobbs Route 1, Box 590 McAllen, TX 78504	Housewife	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. H. Wendell Hobbs Route 1, Box 590 McAllen, TX 78504	(employer and occupation) Housewife	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
e and address) H. Wendell Hobbs e 1, Box 590 len, TX 78504	Self Employed	8/23/84 9/21/84	$200.00 $300.00
	Investments		
ived For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. H. Wendell Hobbs Route 1, Box 590 McAllen, TX 78504	(employer and occupation) Self Employed	(date) 9/21/84	$1,000.00
	Investments		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Harvey Huie 14400 Dallas Parkway P. O. Box 402331 Dallas, TX 75240	Huie Properties/Construction	9/24/84	$1,000.00
	Owner		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. Harvey Huie 14400 Dallas Parkway P. O. Box 402331 Dallas, TX 75240	(employer and occupation) Huie Properties/Construction	(date) 9/24/84	$1,000.00
	Owner		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. James C. Holcomb 2201 Teckla Amarillo, TX 79106	Self-Employed	8/15/84	$1,000.00
	Oil & gas producer		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. James C. Holcomb 2201 Teckla Amarillo, TX 79106	(employer and occupation) self employed	(date) 7/12/84	$1,000.00
	investments		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

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Violation 3 $1000 - H - p. 3

(name and address) Mr. Frank P. Horlock, Jr. P. O. Box 52608 Houston, TX 77052	(employer and occupation) Beer Distributor	(date) 7/02/84	$500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	
(name and address) Mr. Frank P. Horlock, Jr. P. O. Box 52608 Houston, TX 77052	(employer and occupation) Beer Distributor	(date) 8/23/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Michael D. Hutchison 5949 Sherry Lane, Suite 700 Dallas, TX 75225	Landmark Enterprises	9/24/84	$1,000.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation Developer		
	Aggregate Year-to-Date—$ 2,000.00		

Mr. Michael D. Hutchison 5949 Sherry Lane, Suite 700 Dallas, TX 75225	(employer and occupation) Landmark Enterprises Corp. Developer	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

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VIOLATIONS EXCEEDING $1000.00 (K

(name and address)	(employer and occupation)	(date)	
Mr. Thomas T. Keeler P. O. Box 7535 Corpus Christi, TX 78415	Self Employed	9/04/84	$1,000.00
	Investor		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Thomas T. Keeler P. O. Box 7535 Corpus Christi, TX 78415	Self Employed	9/04/84	$1,000.00
	Investor		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Frances W. Klein 1702 N. Julian Amarillo, TX 79102	Self Employed	9/24/84	$1,000.00
	Investments		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Frances W. Klein 1702 N. Julian Amarillo, TX 79102	Self Employed	9/24/84	$1,000.00
	Investments		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Joan Kunitz P. O. Box 1053 Sinton, TX 78387		9/04/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Joan Kunitz P. O. Box 1053 Sinton, TX 78387		9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Ella M. Kellum 2114 Sunnyvale Grand Prairie, TX 35475		9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Ella M. Kellum 2114 Sunnyvale Grand Prairie, TX 35475		9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Joe B. Kercheville 100 NBC Bldg. San Antonio, TX 78205		9/24/84	$1000.00
Receipt For: X Primary O General O Other (specify)	Occupation Aggregate Year-to-Date—$ 1000.00		

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Joe B. Kercheville 100 NBC Building San Antonio, TX 78205		9/24/84	$1000.00
Receipt For O Primary X General O Other (specify)	Occupation Aggregate Year-to-Date—$ 2000.00		

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(name and address)	(employer and occupation)	(date)	
Ms. G. Kimberly Klein 620 S. Taylor Amarillo, TX		9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Ms. G. Kimberly Klein 620 S. Taylor Amarillo, TX		9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Louis W. Kreditor 1365 Regal Row Dallas, TX 75247		9/24/84	$1,000.00
	Clothing Manuf.		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,250.00	

(name and address)	(employer and occupation)	(date)	
Mr. Louis W. Kreditor 1365 Regal Row Dallas, TX 75247		7/23/84	$250.00
	Clothing Manuf.		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,250.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Jessie V. Kniveton 1506 S. Ike Monahans, TX 79756		9/24/84	$500.00
	Retired		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Jessie V. Kniveton 1506 S. Ike Monahans, TX 79756		9/24/84	$1,000.00
	Retired		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	
Mr. James E. Kellum 2114 Sunnyvale Grand Prairie, TX 35475		9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,750.00	

(name and address)	(employer and occupation)	(date)	
Mr. James E. Kellum 2114 Sunnyvale Grand Prairie, TX 35475		9/24/84	$750.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,750.00	

NOT Exceeding $1,000

(employer and occupation)	(date)	
self employed	7/12/84	$25.00
consultant		
Aggregate Year-To-Date:	$225.00	

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EXCEEDING $1000

(name and address)	(employer and occupation)	(date)	
Mr. William David Lacy 3210 Wooded Aires Waco, TX 76703		9/24/84	$900.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,900.00	

(name and address)	(employer and occupation)	(date)	
Mr. William David Lacy 3210 Wooded Aires Waco, TX 76703		9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,900.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Beth Logue 1300 One Energy Square Dallas, TX 75206	Housewife	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Beth Logue 1300 One Energy Square Dallas, TX 75206	Housewife	7/13/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. A. Don Lummus 1413 Amazon Plano, TX 75075	Linc Corp. President	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. A. Don Lummus 1413 Amazon Plano, TX 75075	Linc Corp. President	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

VIOLATION W/ 1000
Exceeding $1000.00

(name and address)	(employer and occupation)	(date)	
Mr. R. K. Lowdon 2727 West Seventh Street Fort Worth, TX 76107	Printing	7/12/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	
Mr. R. K. Lowdon 2727 West Seventh Street Fort Worth, TX 76107	Printing	8/15/84	$500.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	

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M's - Violations exc. $1000

(name and address)	(employer and occupation)	(date)	
Mrs. Frank W. Mayborn 10 South 3rd Temple, TX 76501	Housewife	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Frank W. Mayborn 10 South 3rd Temple, TX 76501	Housewife	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Frank W. Mayborn 10 South 3rd Street Temple, TX 76501	Temple Telegram Publisher/Owner	7/12/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Frank W. Mayborn 10 South 3rd Street Temple, TX 76501	Temple Telegram Publisher/Owner	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Carolyn McElyea P. O. Box 1167 Crockett, TX 75835	Housewife	9/12/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Carolyn McElyea P. O. Box 1167 Crockett, TX 75835	Housewife	9/12/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Gen. Sam Maddux, Jr. 500 Alameda Circle San Antonio, TX 78212	Retired	7/25/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Gen. Sam Maddux, Jr. 500 Alameda Circle San Antonio, TX 78212	Retired	7/25/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

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Violations exc. $1000 (2)

(name and address)	(employer and occupation)	(date)	
Mrs. Geraldine Miller 2001 Bryan Tower, 30th Floor Dallas, TX 75201		9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Geraldine Miller 2001 Bryan Tower, 30th Floor Dallas, TX 75201		9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Vance C. Miller 2001 Bryan Tower, 30th Floor Dallas, TX 75201	Henry S. Miller Company Chm. Exec. Comm.	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Vance C. Miller 2001 Bryan Tower, 30th Floor Dallas, TX 75201	Henry S. Miller Company Chm. Exec. Comm.	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. L. A. McNeil P. O. Box 2928 Corpus Christi, TX 78403	Corpus Christi Oil & Gas Co. Vice Chm. of Board	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. L. A. McNeil P. O. Box 2928 Corpus Christi, TX 78403	Corpus Christi Oil & Gas Co. Vice Chm. of Board	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Montana McKean P. O. Box 1169 Seguin, TX 78155	McKean Prop. Owner	8/02/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Montana McKean P. O. Box 1169 Seguin, TX 78155	McKean Prop. Owner	8/02/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

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Violations exc. $1000 thus (3)

(name and address)	(employer and occupation)	(date)	
Mr. A. P. McEvoy 6301 Preston Parkway Dallas, TX 75205	Western Extrusions	8/20/84	$1,000.00
	Investment		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. A. P. McEvoy 6301 Preston Parkway Dallas, TX 75205	Western Extrusions	9/24/84	$1,000.00
	Investment		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Hon. Eugene M. McElyea P. O. Box 1167 Crockett, TX 75835	Self Employed	9/12/84	$1,000.00
	Attorney		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Hon. Eugene M. McElyea P. O. Box 1167 Crockett, TX 75835	Self Employed	9/12/84	$1,000.0
	Attorney		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Ms. Catharine W. McAnally 620 S. Taylor Amarillo, TX 79101		9/24/84	$1,000.
Received For PRIMARY Election	Aggregate Year-To-Date:	1,000.00	

(name and address)	(employer and occupation)	(date)	
Ms. Catharine W. McAnally 620 S. Taylor Amarillo, TX 79101		9/24/84	$1,000
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Walter M. Mischer P.O. Box 7479 Houston, TX 77008	Allied Banks	9/24/84	$1,000
	Chm. of the Board		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Walter M. Mischer P.O. Box 7479 Houston, TX 77008	Allied Banks	9/24/84	$1,0
	Chm. of the Board		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

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Violations exc. $1000

(9)

(name and address)	(employer and occupation)	(date)	
Mr. William H. Martin 1804 1st Natl. Bank Bldg. Midland, TX 79701	Self-Employed	7/30/84	$1,000.00
	Petroleum Engineer		
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	

(name and address)	(employer and occupation)	(date)	
Mr. William H. Martin 1804 1st Natl. Bank Bldg. Midland, TX 79701	Self-Employed	7/30/84	$1,000
	Petroleum Engineer		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

Mrs. Karen Martin 1404 Country Club Drive Midland, TX 79701	M. W. J. Producing	8/09/84	$1,000.00
	Partner		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	

(name and address)	(employer and occupation)	(date)	
Mrs. Karen Martin 1404 Country Club Drive Midland, TX 79701	M. W. J. Producing	8/09/84	$1,000.00
	Partner		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

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VIOLATION

N's

EXCEEDING $1000.00

(name and address)	(employer and occupation)	(date)	
Mrs. Bettye Newlin 510 Hazelwood Ft. Worth, TX 76107		8/20/84	$1,000.00
Received For PRIMARY Election	Housewife Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Bettye Newlin 510 Hazelwood Ft. Worth, TX 76107		8/27/84	$1,000.00
Received For GENERAL Election	Housewife Aggregate Year-To-Date:	$2,000.00	

VIOLATION

N

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[redacted]	(employer and occupation) Akin, Gump, Strauss, Hauer, and Feld	(date) 05/07/84	(amount) $1,000.00
Received For General Election	attorney Aggregate year-to-date:	$1,000.00	

(name and address) Mrs. Carl E. Oates 6924 Stefani Dallas, TX 75225	(employer and occupation) Housewife	(date) 9/24/84	(amount) $1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address) Mr. Carl E. Oates 6924 Stefani Dallas, TX 75225	(employer and occupation) Self Employed Attorney	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address) Mr. Carl E. Oates 6924 Stefani Dallas, TX 75225	(employer and occupation) Self Employed Attorney	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address) Mr. Gene E. Overbeck 1101 - 17th Street, N. W. Washington, DC 20036	(employer and occupation) American Airlines Sr. V.P.	(date) 9/10/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address) Mr. Gene E. Overbeck 1101 - 17th Street, N. W. Washington, DC 20036	(employer and occupation) American Airlines Sr. V.P.	(date) 9/10/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

VIOLATIONS
(exceeding $1000.00)

O

(name and address) Mr. C. O. Overcash 3850 Bellaire Circle Fort Worth, TX 76109	(employer and occupation) Self Employed Developer	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address) Mr. C.O. Overcash 3850 Bellaire Circle Fort Worth, TX 76109	(employer and occupation) [redacted]		(amount) $1,000.00
Received for Primary Election	Aggregate year-to-date:	$1,000.00	

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VIOLATIONS exceedin $1000.00 ?

(name and address)	(employer and occupation)	(date)	
Mr. Daniel T. Parker P. O. Box 107 Houston, TX 77001	Parker Brothers, Inc.	9/20/84 9/20/84	$100.00 $100.00
	Dir-Communications		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,200.00	
(name and address) Mr. Daniel T. Parker P. O. Box 107 Houston, TX 77001	(employer and occupation) Parker Brothers, Inc.	(date) 9/27/84	$1,000.00
	Dir-Communications		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,200.00	
(name and address) Ms. Anne Pickens 3926 Potomac Dallas, TX 75205	(employer and occupation)	(date) 7/30/84	$1,000.00
	Student		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Ms. Anne Pickens 3926 Potomac Dallas, TX 75205	(employer and occupation)	(date) 7/30/84	$1,000.00
	Student		
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	
(name and address) Ms. Paige Pickens 3926 Potomac Street Dallas, TX 75205	(employer and occupation)	(date) 7/30/84	$1,000.00
	Student		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Ms. Paige Pickens 3926 Potomac Street Dallas, TX 75205	(employer and occupation)	(date) 7/30/84	$1,000.00
	Student		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

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VIOLATIONS EXCEEDING $1000.00

(name and address)	(employer and occupation)	(date)	
Mrs. Elga Rea 5305 Mariners Drive Plano, TX 75075		9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Elga Rea 5305 Mariners Drive Plano, TX 75075		9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Edward Rea 5305 Mariners Drive Plano, TX 75075	Triland President	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Edward Rea 5305 Mariners Drive Plano, TX 75075	Triland President	9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. S. J. Rogers P. O. Box 1310 Beaumont, TX 77006	Rogers Brothers Partner	9/05/84	$1,500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	
Mr. S. J. Rogers P. O. Box 1310 Beaumont, TX 77006	Rogers Brothers Partner	9/05/84 9/05/84	$[illegible] $[illegible]
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	
[illegible] P. O. Box [illegible] Abilene, TX 79105	Roach Oil Co. President	8/01/84	$[illegible]
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,200.00	

(name and address)	(employer and occupation)	(date)	
Mr. T. L. Roach, Jr. P. O. Box 1871 Abilene, TX 79105	Roach Oil Co. President	8/02/84	$[illegible].00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,200.00	

VIOLATIONS

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(name and address)	(employer and occupation)	(date)	
Ms. Laurie Ramsey 3510 Cranbrook Wichita Falls, TX 76308		8/31/84	$25.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,025.00	
(name and address) Ms. Laurie Raasey 3510 Cranbrook Wichita Falls, TX 76308	(employer and occupation)	(date) 9/19/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,025.00	
(name and address) Mr. G. E. Roney 3316 Kent Lane McAllen, TX 78501	(employer and occupation)	(date) 8/23/84	$1,000.00
Received For PRIMARY Election	Banker Aggregate Year-To-Date:	$2,000.00	
Mr. G. E. Roney 3316 Kent Lane McAllen, TX 78501	(employer and occupation)	(date) 8/23/84	$1,000.00
Received For GENERAL Election	Banker Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	

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$1000 & VIOLATIONS exceeding $1000.25

(name and address)	(employer and occupation)	(date)	
Mr. R. J. Schumacher 3402 Tx. American Bk. Bldg. Ft. Worth, TX 76102	Texland Petroleum Executive	9/27/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	
Mr. R. J. Schumacher 3402 Tx. American Bk. Bldg. Ft. Worth, TX 76102	Texland Petroleum Executive	8/07/84	$500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	
Mr. Weldon H. Smith 7500 San Felipe Suite #666 Houston, TX 77063	Big Six Drilling Company CEO	7/31/84	$500.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	(amount)
Mr. Weldon H. Smith 7500 San Felipe Street Suite 600 Houston, TX 77063	Cullen [redacted] Service Appraiser	06/13/84	$500.
Received for Primary Election	Aggregate [redacted]-to-date:	$500.00	

(name and address)	(employer and occupation)	(date)	(amount)
Mr. Richard T. Sink P.O. Box BWH Wichita Falls, TX 76307	Mathis [redacted] CPA		$1,00[redacted]
a) In-Kind; Newspaper Advertisement; Times Publishing Received for General Election	Aggregate year-to-date:		

(name and address)	(employer and occupation)	(date)	
Mr. Richard T. Sink P.O. Box BWH Wichita Falls, TX 76307	Mathis West Huffines & Co CPA	9/25/84 9/26/84	$276.99 $491.40
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,768.39	

(name and address)	(employer and occupation)	(date)	(amount)
Mr. John M. Stemmons 2700 Stemmons Freeway Dallas, TX 75207	self land dev[redacted]	05/29/84	,000.00
Received For General Election	Aggregate year-to-date:	$1,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. John M. Stemmons 2700 Stemmons Freeway Dallas, TX 75207	Industrial Properties Owner	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Arthur Seeligson, III 1604 NBC Building San Antonio, TX 78205	Self-Employed Investments	7/17/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Arthur Seeligson, III 1604 NBC Building San Antonio, TX 78205	Self-Employed Investments	7/17/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

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VIOLATIONS

(name and address)	(employer and occupation)	(date)	
E. Trine Starnes 219 Heritage Oaks Houston, TX 77024	Century Capital Corp. CEO	9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. E. Trine Starnes 219 Heritage Oaks Houston, TX 77024	(employer and occupation) Century Capital Corp. CEO	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Merle F. Stieler P. O. Box 308 Comfort, TX 78013	(employer and occupation) Self Employed Rancher	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Merle F. Stieler P. O. Box 308 Comfort, TX 78013	(employer and occupation) Self Employed Rancher	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Pat Schiff 5307 East Mockingbird Lane Dallas, TX 75206	(employer and occupation) Homemaker	(date) 9/21/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Pat Schiff 5307 East Mockingbird Lane Dallas, TX 75206	(employer and occupation) Homemaker	(date) 9/21/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. S. S. Seltzer, Jr. 4025 Ocean Drive P. O. Box 6382 Corpus Christi, TX 78411	(employer and occupation) Retired	(date) 8/15/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. S. S. Seltzer, Jr. 4025 Ocean Drive P. O. Box 6382 Corpus Christi, TX 78411	(employer and occupation) Retired	(date) 8/15/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1,000.00	
(name and address) Mrs. Cathy Sowers 4811 - 32nd Street Dickinson, TX 77539	(employer and occupation) Astro-Resources International Marketing	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Cathy Sowers 4811 - 32nd Street Dickinson, TX 77539	(employer and occupation) Astro-Resources International Marketing	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	

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(name and address)	(employer and occupation)	(date)	
Mr. John M. Stemmons, Jr. 2700 Stemmons Freeway Dallas, TX 75207	Industrial Properties	9/24/84	$1,000.00
	Owner		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. John M. Stemmons, Jr. 2700 Stemmons Freeway Dallas, TX 75207	Industrial Properties	8/23/84	$1,000.00
	Owner		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. J. T. Shelton 3609 Pioneer Parkway Arlington, TX 76013	All American Company	8/17/84	$500.00
	Home Builder		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	
(name and address)	(employer and occupation)	(date)	
Mr. J. T. Shelton 3609 Pioneer Parkway Arlington, TX 76013	All American Company	9/24/84	$1,000.00
	Home Builder		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	
Mr. Herbert Schiff 5307 East Mockingbird Lane, Dallas, TX 75206	H. C. Schiff & Co.	9/21/84	$1,000.00
	Attorney		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. Herbert Schiff 5307 East Mockingbird Lane, Dallas, TX 75206	H. C. Schiff & Co.	9/24/84	$1,000.00
	Attorney		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
[illegible]	[illegible]	9/24/84	$1,000.00
	[illegible]		
[illegible] Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
[illegible]	[illegible]	9/24/84	$1,000.00
	[illegible]		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
[illegible]		7/17/84	$1,000.00
[illegible]	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
[illegible]		7/17/84	$1,000.00
[illegible]	Aggregate Year-To-Date:	$2,000.00	

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VIOLATIONS EXCEEDING $1000.00

(name and address) Mr. Wayne Thomas P. O. Box 1917 Hereford, TX 79045	(employer and occupation) Thomas & Burdette Lawyer	(date) 9/24/84	100.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,100.00	
(name and address) Mr. Wayne Thomas P. O. Box 1917 Hereford, TX 79045	(employer and occupation) Thomas & Burdette Lawyer	(date) 8/20/84	1000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	
[illegible] Mrs. David R. Tacke [illegible] Royal Cre[illegible] Dallas, TX 7522[illegible]	(employer and occupation) Housewife	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	
(name and address) Mrs. David R. Tacke 5410 Royal Crest Dallas, TX 75229	(employer and occupation) Housewife	(date) 9/24/84	$500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	
(name and address) Mr. Robert L. Trimble P. O. Box 8020087 Dallas, TX 75380	(employer and occupation) Southwestern Bapt. Theological Sem. Audio-Visual Dir.	(date) 9/19/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	
(name and address) Mr. Robert L. Trimble P. O. Box 8020087 Dallas, TX 75380	(employer and occupation) Southwestern Bapt. Theological Sem. Audio-Visual Dir.	(date) 9/19/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. David R. Tacke 5410 Royal Crest Dallas, TX 75229	(employer and occupation) E-Systems President	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,750.00	
(name and address) Mr. David R. Tacke 5410 Royal Crest Dallas, TX 75229	(employer and occupation) E-Systems President	(date) 9/24/84	$500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,750.00	
(name and address) Mrs. Theresa Tacke 602 Slaton Road Lubbock, TX 79406	(employer and occupation) Housewife	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Theresa Tacke 602 Slaton Road Lubbock, TX 79406	(employer and occupation) Housewife	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

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VIOLATIONS
EXCEEDING $1000.00

(Name and address)	(employer and occupation)	(date)	
Mrs. Chester R. Upham, Jr. P. O. Box 940 Mineral Wells, TX 76067	Self-Employed	9/24/84	$1,000.00
	Ind. Oil & Gas		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(Name and address)	(employer and occupation)	(date)	
Mrs. Chester R. Upham, Jr. P. O. Box 940 Mineral Wells, TX 76067	Self-Employed	9/24/84	$1,000.00
	Ind. Oil & Gas		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(Name and address)	(employer and occupation)	(date)	

VIOLATIONS

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VIOLATIONS EXCEEDING $1000.00 W

(name and address) Mrs. Esther Westby-Aus 1220 N. E. 17th, Apt. 6A Portland, OR 97232	(employer and occupation) Retired	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Esther Westby-Aus 1220 N. E. 17th, Apt. 6A Portland, OR 97232	(employer and occupation) Retired	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) [illegible] Robert V. West, Jr. [illegible] Tesoro Drive San Antonio, TX 78286	(employer and occupation) Self Employed Physician	(date) 7/17/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Dr. Robert V. West, Jr. 8700 Tesoro Drive San Antonio, TX 78286	(employer and occupation) Self Employed Physician	(date) 7/17/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. John H. White P. O. Box 16309 San Antonio, TX 78216	(employer and occupation) Retired	(date) 7/17/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
Mr. John H. White P. O. Box 16309 San Antonio, TX 78216	 Retired	7/17/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Leila Windom 1562 South Drive Sarasota, FL 33579	(employer and occupation)	(date) 9/24/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Leila Windom 1562 South Drive Sarasota, FL 33579 WINDOM	(employer and occupation)	(date) 9/24/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	
(name and address) Mr. Robert L. Wheelock, Jr. P. O. Box 1239 Corsicana, TX 75110	(employer and occupation) Self-Employed Rancher	(date) 7/13/84	$500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	
(name and address) Mr. Robert L. Wheelock, Jr. P. O. Box 1239 Corsicana, TX 75110	(employer and occupation) Self-Employed Rancher	(date) 7/13/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	

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Violation exceeds $1000

(name and address)	(employer and occupation)	(date)	
Dr. Robert E. Windom 1562 South Drive Sarasota, FL 33579	Robert E. Windom, M.D. PA	9/24/84	$1,000.00
Received For Primary Election	Doctor		
	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	(amount)
Dr. Robert E. Windom 1562 South Drive Sarasota, FL 33579	self	06/04/84	$1,000.00
Received For General Election	doctor		
	Aggregate year-to-date:	$1,000.00	

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exceeding $1000

(name and address)	(employer and occupation)	(date)	
Mr. N. M. Yost P.O. Box 678 Gainesville, TX 76240	Self Employed	7/27/84	$100.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,100.00	

(name and address)	(employer and occupation)	(date)	
Mr. N. M. Yost P.O. Box 678 Gainesville, TX 76240	Self Employed	8/06/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,100.00	

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VIOLATION EXCEEDING $1000

(name and address) Mrs. H. B. Zachry, Jr. 7603 Shadylane San Antonio, Tx 78209	(employer and occupation)	(date) 7/17/84	$1,000.00
Received For PRIMARY Election	Housewife		
	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. H. B. Zachry, Jr. 7603 Shadylane San Antonio, TX 78209	(employer and occupation)	(date) 7/17/84	$1,000.00
Received For GENERAL Election	Housewife		
	Aggregate Year-To-Date:	$2,000.00	

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VIOLATIONS II (over $1000.00)

(name and address)	(employer and occupation)	(date)	
Mr. B. S. Baker 8638 LaFonte Houston, TX 77024	Federal Government U. S. Marshall	10/09/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. B. S. Baker 8638 LaFonte Houston, TX 77024	Federal Government U. S. Marshall	10/09/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. Thomas M. Benson, Jr. 9400 San Pedro San Antonio, TX 78216		10/09/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. Thomas M. Benson, Jr. 9400 San Pedro San Antonio, TX 78216		10/09/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. M. N. Bostick P. O. Box 7529 Waco, TX 76710	KWTX TV station manager	10/11/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,750.00	
(name and address)	(employer and occupation)	(date)	
Mr. M. N. Bostick P. O. Box 7529 Waco, TX 76710	KWTX TV station manager	10/11/84	$250.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,750.00	
(name and address)	(employer and occupation)	(date)	
Mr. E.B. Bottom 1200 Elm Mission, TX	banker	10/03/84	$500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. E.B. Bottom 1200 Elm Mission, TX		10/03/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mrs. Adelle Bottom 1200 Elm Mission, TX	Housewife	10/03/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mrs. Adelle Bottom 1200 Elm Mission, TX	Housewife	10/03/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,000.00	

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VIOLATIONS II (over $1000.00)

(name and address)	(employer and occupation)	(date)	
Mr. Hogan T. Brooks P. O. Box 1428 Conroe, TX 77305	student	10/15/84	$700.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,700.00	

(name and address)	(employer and occupation)	(date)	
Mr. Hogan T. Brooks P. O. Box 1428 Conroe, TX 77305	student	10/15/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,700.00	

(name and address)	(employer and occupation)	(date)	
Mr. Fred Brown P.O. Box 688 Mexia, TX 76667		10/05/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Fred Brown P.O. Box 688 Mexia, TX 76667		10/05/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Robert J. Bruni 6326 Sovereign Drive Suite 250-2 San Antonio, TX 78229		10/09/84 10/12/84	$200.00 $600.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,100.00	

(name and address)	(employer and occupation)	(date)	
Mr. Robert J. Bruni 6326 Sovereign Drive Suite 250-2 San Antonio, TX 78229		10/03/84	$100.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,100.00	

(name and address)	(employer and occupation)	(date)	
Mr. Sam Buchanan P. O. Box 89 Texarkana, AR 75504		10/10/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Sam Buchanan P. O. Box 89 Texarkana, AR 75504		10/10/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Douglas M. Conlee Box 7247 Waco, TX 76710	Conlee Seed CO. Owner	10/09/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,100.00	

(name and address)	(employer and occupation)	(date)	
Mr. Douglas M. Conlee Box 7247 Waco, TX 76710	Conlee Seed CO. Owner	10/09/84	$100.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,100.00	

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VIOLATIONS II (over $1000.00)

(name and address)	(employer and occupation)	(date)	
Mrs. Michelle K. Connor 3020 Duke Houston, TX 77005	Self Employed	10/03/84	$1,000.00
	Investor		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Michelle K. Connor 3020 Duke Houston, TX 77005	Self Employed	10/03/84	$1,000.00
	Investor		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. James Lewis Connor III 3020 Duke Houston, TX 77005	Self Employed	10/03/84	$1,000.00
	Investments		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. James Lewis Connor III 3020 Duke Houston, TX 77005	Self Employed	10/09/84	$1,000.00
	Investments		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Harold D. Courson Box 809 Ferryton, TX 79070		10/10/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Harold D. Courson Box 809 Ferryton, TX 79070		10/10/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Andrew Fasken 3140 Clark Lane Paris, TX 75460		10/10/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,900.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Andrew Fasken 3140 Clark Lane Paris, TX 75460		10/10/84	$700.00
	housewife		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,900.00	

(name and address)	(employer and occupation)	(date)	
Mr. Ernest Bel Fay 2304 - 1st City Natl. Bank Houston, TX 77002	Self-Employed	10/09/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Ernest Bel Fay 2304 - 1st City Natl. Bank Houston, TX 77002	Self-Employed	10/09/84	$1,000.00
	investments		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

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VIOLATIONS II (over $1000.00)

(name and address)	(employer and occupation)	(date)	
Mr. P. Gill P. O. Box 599 San Antonio, TX 78292	Richard Gill Co. mortgage banker	10/12/84	$200.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,200.00	
(name and address) Mr. P. Gill P. O. Box 599 San Antonio, TX 78292	(employer and occupation) Richard Gill Co. mortgage banker	(date) 10/12/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,000.00	
(name and address) Mr. George S. Hawn 101 N. Shoreline Corpus Christi, TX 78401	(employer and occupation) Hawn Brothers President	(date) 10/04/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1000.00	
(name and address) Mr. George S. Hawn 101 N. Shoreline Corpus Christi, TX 78401	(employer and occupation) Hawn Brothers President	(date) 10/04/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Edith Huebner P.O. Drawer 20350 San Antonio, TX 78286	(employer and occupation) Housewife	(date) 10/10/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,325.00	
(name and address) Mrs. Edith Huebner P.O. Drawer 20350 San Antonio, TX 78286	(employer and occupation) Housewife	(date) 10/01/84	$50.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,325.00	
(name and address) Mrs. H. L. Hunt 1401 InterFirst One Dallas, TX 75202	(employer and occupation) Housewife	(date) 10/03/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	1,000.00	
(name and address) Mrs. H. L. Hunt 1401 InterFirst One Dallas, TX 75202	(employer and occupation) Housewife	(date) 10/03/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

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VIOLATIONS II (over $1000)

(name and address)	(employer and occupation)	(date)	
Mr. Ray L. Hunt 1401 InterFirst One Dallas, TX 75202	Hunt Oil Company President	10/03/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. Ray L. Hunt 1401 InterFirst One Dallas, TX 75202	Hunt Oil Company President	10/03/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Nancy A. Hunt 1401 InterFirst One Dallas, TX 75202	Housewife	10/03/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,000.00	
(name and address)	(employer and occupation)	(date)	
Mrs. Nancy A. Hunt 1401 InterFirst One Dallas, TX 75202	Housewife	10/03/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. J. I. Jackson 3880 Hulen Street, Suite 329 Fort Worth, TX 76107	self employed Business Consult.	10/01/84	$100.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,100.00	
(name and address)	(employer and occupation)	(date)	
Mr. J. I. Jackson 3880 Hulen Street, Suite 329 Fort Worth, TX 76107	Business Consult.	10/09/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,100.00	

(name and address)	(employer and occupation)	(date)	
Mr. Abe M. Katz Box 1436 Corpus Christi, TX 78403	Vegetable Marketer	10/04/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	
(name and address)	(employer and occupation)	(date)	
Mr. Abe M. Katz Box 1436 Corpus Christi, TX 78403	Vegetable Marketer	10/04/84	$500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	

(name and address)	(employer and occupation)	(date)	
Mr. Frederick R. Meyer 5830 Averill Way Dallas, TX 75225	Tyler Corp. executive	10/10/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address)	(employer and occupation)	(date)	
Mr. Frederick R. Meyer 5830 Averill Way Dallas, TX 75225	Tyler Corp. executive	10/10/84	$1,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

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VIOLATIONS II (over $1000.00)

(name and address)	(employer and occupation)	(date)	
Mrs. Drayton McLane, Jr. P. O. Box 927 Temple, TX 76501	Homemaker	7/05/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Drayton McLane, Jr. P. O. Box 927 Temple, TX 76501	Homemaker	10/15/84	$1,0
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	(amount)
Mr. Robert L. Bradley 4200 Texas Commerce Tower Houston, TX 77002	Andrews and Kurth attorney	06/25/84	$1,000.00
Received For General Election	Aggregate year-to-date:	$1,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Robert L. Bradley 4200 Texas Commerce Tower Houston, TX 77002	Andrews and Kurth Attorney	8/13/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,000.00	

(name and address)	(employer and occupation)	(date)	
Dr. R. A. Box 2604 Jarratt Austin, TX 78703	Self-Employed Dentist	7/19/84	$1,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$1,100.00	

(name and address)	(employer and occupation)	(date)	
Dr. R. A. Box 2604 Jarratt Austin, TX 78703	Self-Employed Dentist	10/09/84	$500.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,600.00	

(name and address)	(employer and occupation)	(date)	
Mr. Refugio Gonzales, Jr. 8830 Huffsmith Road Tomball, TX 77375	Self-Employed Export/Import Serv	9/10/84	$100.00
Received For GENERAL Election	Aggregate Year-To-Date:	$500.00	

(name and address)	(employer and occupation)	(date)	
Mr. Refugio Gonzales, Jr. 8830 Huffsmith Road Tomball, TX 77375	Self-Employed Export/Import Serv	7/23/84	$100.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$500.00	

(name and address)	(employer and occupation)	(date)	
Mr. Refugio Gonzales, Jr. 8830 Huffsmith Road Tomball, TX 77375	Self-Employed Export/Import Serv	10/15/84	$600.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Refugio Gonzales, Jr. 8830 Huffsmith Road Tomball, TX 77375	Self-Employed Export/Import Serv	10/15/84 10/15/84	$650.00 $250.00
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

8904074351 I I

VIOLATION II (over $1000.00)

(name and address) Mr. Walter M. Mischer, Jr. 2727 North Loop West Houston, TX 77008	(employer and occupation) Allied Banks	(date) 10/09/84	$1,000.00
	CEO		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,000.00	
(name and address) Mr. Walter M. Mischer, Jr. 2727 North Loop West Houston, TX 77008	(employer and occupation) Allied Banks	(date) 10/09/84	$1,000.00
	CEO		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mrs. Anita Rogers P. O. Box 1077 Edinburg, TX 78539	(employer and occupation)	(date) 10/01/84	$500.00
	Housewife		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,500.00	
(name and address) Mrs. Anita Rogers P. O. Box 1077 Edinburg, TX 78539	(employer and occupation)	(date) 10/01/84	$1,0
	Housewife		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,500.00	
(name and address) Mr. G. W. Sanford 1803 Denton Dr. Carrollton, TX 75006	(employer and occupation)	(date) 10/15/84 10/15/84	$1,000.00 $1,000.00
	Retired		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
Received for PRIMARY Election			
(name and address) Mr. Frank J. Scanio, Jr. La Rosa Ranch Woodsboro, TX 78393	(employer and occupation) self employed	(date) 10/04/84	$1,000.00
	Rancher		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. Frank J. Scanio, Jr. La Rosa Ranch Woodsboro, TX 78393	(employer and occupation) self employed	(date) 10/04/84	$1,000.00
	Rancher		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1000.00	

8904074351 2

VIOLATIONS II (over $1000.00)

(name and address)	(employer and occupation)	(date)	
[illegible] Ross Workman [illegible] O. Box 1396 [illegible]ouston, TX 77251	Transco Energy	10/09/84	$1,000.00
	Executive		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,050.00	
(name and address) Mr. Ross Workman P. O. Box 1396 Houston, TX 77251	(employer and occupation) Transco Energy	(date) 10/09/84	$50.00
	Executive		
Received For PRIMARY Election	Aggregate Year-To-Date:	$ 50.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Mildred W. Simmons P.O. Box 186 Imperial, TX 79743		10/02/84	$500.00
	Homemaker		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,115.00	
(name and address) Mrs. Mildred W. Simmons P.O. Box 186 Imperial, TX 79743	(employer and occupation)	(date) 10/12/84 10/02/84	$50.00 $500.00
	Homemaker		
Received For GENERAL Election	Aggregate Year-To-Date:	$1,115.00	

(name and address)	(employer and occupation)	(date)	
Mr. John M. Stemmons, Jr. 2700 Stemmons Freeway Dallas, TX 75207	Industrial Properties	9/24/84	$1,000.00
	Owner		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. John M. Stemmons, Jr. 2700 Stemmons Freeway Dallas, TX 75207	(employer and occupation) Industrial Properties	(date) 8/23/84	$1,000.00
	Owner		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) Mr. John M. Stemmons, Jr. 2700 Stemmons Freeway Dallas, Tx 75207	(employer and occupation) Industrial Properties	(date) 10/09/84	$1,000.00
	Owner		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mrs. Edith Jones O'Donnell 3300 Interfirst One Dallas, TX 75202		10/05/84	$1,0
	Housewife		
Received For PRIMARY Election	Aggregate Year-To-Date:	$1,000.00	

(name and address)	(employer and occupation)	(date)	(amount)
Mrs. Edith J. O'Donnell 4929 Sen[illegible] Dallas, [illegible] 75209	none	06/27/84	$1,000.00
	homemaker		
Received [illegible]r General Election	Aggregate year-to-date:	$1,000.00	

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PAC VIOLATIONS OVER $5000.

(name and address) Texas Repub. Cong. Comm. P. O. Box 855 Austin, TX 78767	(employer and occupation) Political Action Committee	(date) 9/24/84	$5,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$10,000.00	
(name and address) Texas Repub. Cong. Comm. P. O. Box 855 Austin, TX 78767	(employer and occupation) Political Action Committee	(date) 9/04/84	$5,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$10,000.00	
(name and address) American Bankers Assoc. PAC 1120 Connecticut Ave., N.W. Washington, DC 20036	(employer and occupation) Political Action Committee	(date) 9/24/84	$5,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$ 5,000.00	
(name and address) American Bankers Assoc. PAC 1120 Connecticut Ave., N.W. Washington, DC 20036	(employer and occupation) Political Action Committee	(date) 9/24/84	$5,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$10,000.00	
(name and address) American Family PAC Box 1480 Attn: John Aaos Columbus, GA 31902	(employer and occupation) Political Action Committee	(date) 7/16/84	$2,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	
(name and address) American Family PAC Box 1480 Attn: John Aaos Columbus, GA 31902	(employer and occupation) Political Action Committee	(date) 9/21/84	$5,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$7,000.00	
(name and address) [illegible]	(employer and occupation) Political Action Committee	(date) 9/10/84	$5,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$5,000.00	
(name and address) [illegible] 1120 Conn. Ave. N.W. One Lafayette Center, Suite Washington, DC 20036	(employer and occupation) Political Action Committee	(date) 9/24/84	$5,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$10,000.00	

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(name and address)	(employer and occupation)	(date)	
National Federation of Independent Business 150 W. 20th Ave. San Mateo, CA 94403	Political Action Committee	7/25/84	$3,000.00
Received For PRIMARY Election	Aggregate Year-To-Date:	$4,000.00	

(name and address)	(employer and occupation)	(date)	
National Federation of Independent Business PAC 150 W. 20th Ave. San Mateo, CA 94403	Political Action Committee	10/10/84	$4,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$8,000.00	

Houston Industries PAC 1701 Pennsylvania Ave. Washington, D. C. 20016	Political Action C...	11/24/83	500
	Occupation		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Houston Industries PAC P. O. Box 1700 [illegible] TX 77001	Political Action Comm...	5/3/84	5,000
	Aggregate Year-to-Date-$ 5,000		

Federated Employees Good Govt. PAC P.O. Box 2511 Houston, TX 77001	Political Action Committee	(date) 10/10/84 10/09/84	$ [illegible] $4,000.00
Received For GENERAL Election	Aggregate Year-To-Date:	$10,000.00	

[illegible]	[illegible]	(date) 7/02/84 8/21/84 9/14/84	$ [illegible]
[illegible]	[illegible]	$5,000.00	

[illegible] Good Govt. [illegible] P.O. Box 2511 [illegible] TX 77001	Political Action Comm...	Date (month, day, year) 8/13/84	A...
	Occupation		
	Aggregate Year-to-Date-$ 3,000		

(name and address)	(employer and occupation)	(date)	
Natl. Home Builders-PAC 15th and M Streets NW. Washington, DC 20005	Political Action Committee	7/31/84	$5,000.00
Received For Primary Election	Aggregate Year-To-Date:	$5,000.00	

(name and address)	(employer and occupation)	(date)	
National Home Builders PAC 15th and M Streets NW Washington, D. C. 20005	Political Action Committee	9/20/84	$500.00
Received For GENERAL Election	Aggregate Year-To-Date:	$5,500.00	
(name and address) Natl. Home Builders-PAC 15th and M Streets NW. Washington, DC 20005	(employer and occupation) Political Action Committee	(date) 10/12/84	$5,000.00

8904074351 5

Scrutiny of finances sought by Doggett

Associated Press

Democrat Lloyd Doggett, saying Republican U.S. Senate candidate Phil Gramm apparently violated federal campaign finance laws, Thursday called on Gramm to open his campaign books for public inspection.

At news conferences in Wichita Falls, Dallas, Shreveport, La., and Beaumont, Doggett noted that Gramm initially reported no debt from the May 5 primary but that he later reported taking some $110,000 in contributions after the primary to cover expenses from that election.

"The federal election law is very clear on that. He had an opportunity right there in a sworn form ... to show whether he had a debt or not. It's a question of whether he lied then or he lied now," Doggett said.

In his July 15 campaign finance report, a sworn statement filed with the Federal Election Commission, Gramm's campaign reported no outstanding debts and a cash balance of $59,250.

And after the primary, Doggett said, "Mr. Gramm went all over the state boasting and bragging that he ran a real fiscally responsible campaign, that he didn't have any debt from the primary."

During a news conference in Abilene, Gramm said Thursday his Democratic opponent's assertion that he has "lied" on campaign finance reports is unfounded and is an effort to divert attention from the real issues of the race.

"I think that this is an example again where my opponent is desperately grabbing at straws to try to keep the focus of the campaign from being on the issues," Gramm said.

Late primary campaign contributions are legal only if spent on primary campaign debts.

In reports filed with the FEC, Gramm showed no debt for the period that ended on June 30. He since has reported paying more than $214,000 in campaign bills for the spring primary.

Gramm said that a consolidated bookkeeping procedure resulted in him not "being in the red," but still having a debt for the primary.

In Abilene — the fifth stop of a seven-city campaign trek Thursday for Gramm — the Republican said he had not lied about his finances.

"We had a lot of bills come in at the end of our primary, but we were also actively raising money for the general election," Gramm said as he explained his FEC reporting method, which was to consolidate his primary and general election contributions.

"We did have a primary debt," he said. "We do have a primary debt now and we raised money for the general election and to pay off the primary debt."

However, Doggett said, "It's important to remember that this particular report (the July 15 FEC document) was filed 2½ months after the primary of May 5 had ended," because in his subsequent FEC report covering the period from July 1 to Sept. 30, Gramm showed that he took some $110,000 in primary contributions.

8904074351516

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 31, 1984

HAND DELIVERED

James Schoener, Esquire
MILLER, CANFIELD, PADDOCK & STONE
2555 M Street, N.W.
Washington, D.C. 20037

RE: MUR 1837

Dear Mr. Schoener:

This letter is to notify your client, John Baxter and Friends of Phil Gramm Committee, that on October 30, 1984, the Federal Election Commission received a complaint which alleges that John Baxter and Friends of Phil Gramm Committee violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against John Baxter and Friends of Phil Gramm Committee in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, John Baxter and Friends of Phil Gramm Committee will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074351 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 31, 1984

HAND DELIVERED

James Schoener, Esquire
MILLER, CANFIELD, PADDOCK & STONE
2555 M Street, N.W.
Washington, D.C. 20037

RE: MUR 1837

Dear Mr. Schoener:

This letter is to notify your client, Ruth Cymber, that on October 30, 1984, the Federal Election Commission received a complaint which alleges that Ruth Cymber violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against Ruth Cymber in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, Ruth Cymber will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074351 9

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074355220

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. M.N. Bostick
P.O. Box 7528
Waco, TX 76710

RE: MUR 1837

Dear Mr. Bostick:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074352 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 31, 1984

HAND DELIVERED

James Schoener, Esquire
MILLER, CANFIELD, PADDOCK & STONE
2555 M Street, N.W.
Washington, D.C. 20037

RE: MUR 1837

Dear Mr. Schoener:

This letter is to notify your client, Phil Gramm, that on October 30, 1984, the Federal Election Commission received a complaint which alleges that Phil Gramm violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against Phil Gramm in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, Phil Gramm will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074352 2

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074352 3

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 7 4 3 5 2 4

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $___

3. ARTICLE ADDRESSED TO:
Mr. H N. Bostick
PO Box 7528
Waco. TX 76710

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943220

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

SENSITIVE

RECEIVED
FEC
SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NOV 1 A9:53

November 1, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

SUBJECT: Complaint filed in MUR 1837
Respondents:
Representative Phil Gramm
The Friends of Phil Gramm and
Ruth Cymber, as Assistant Treasurer,
and John Baxter, as treasurer
The American Bankers Association BankPAC
American Family PAC
Union Pacific Fund
Houston Industries Political Action Committee
Tennaco Employees Good Government Fund
National Home Builders PAC
Texas Republican Congressional Committee
David Crowley
John Stemmons, Jr.
159 other individuals*

8204074352 5

The above-referenced complaint is an expedited compliance matter. The complaint, filed by Ms. Donna Mobley, alleges that Phil Gramm, and the Friends of Phil Gramm ("the Committee") and its treasurer and assistant treasurer, failed to report outstanding debts and obligations on the 1984 July Quarterly Report. Alternatively, the complaint alleges the Committee received contributions designated for the primary election after the date of such election and at a time when no primary debts were outstanding. This latter allegation charges that the other above-named respondents and 159 other individuals made contributions in excess of the Act's limitations because such funds were used for the general election when the respondents had already made the maximum permitted contribution for that election. It is alleged these violations were knowing and willful.

Upon receipt of a response to the Commission's notice of a complaint or, upon the expiration of the 15 day response period, whichever occurs first, we will forward a report containing appropriate recommendations to the Commission.

*See Listing in Attachment 1.

Attachment 1

The following is a listing of the 159 other respondents in MUR 1837.

Mrs. Maragret Alkek

Mr. Alvis Arthur

Mr. James W. Arnold

Dr. William L. Anderson

Mrs. Helen Allen

Mr. C. J. Allen

Mr. Roland Arthur

Mrs. Ebby Halliday Acers

Mrs. Helen Bankston

Mr. Louis A. Beecher I, Jr.

Mr. D. Phil Bolin

Mr. D.E. Brand

Mr. L.D. Brinkman

Mrs. L. D. Brinkman

Mr. B.G. Brookshire

Mr. William E. Burford

Mr. L.D. Burns

Mr. George W. Bush

Mrs. Elloine M. Calder

Mr. Bruce Calder

Mr. Arthur Cary

Mr. Gene F. Canavan

Mr. Donald M. Carlton

Mr. Frank Cass

Mr. William G. Cass

Mrs. Mary Cass

Mr. Michael L. Cass

3004074335 26

Mr. W. Allen Custard

Dr. William H. Crain

Mr. Roy C. Coffee

Mr. Joel Daniel

Mr. Gilbert M. Denman, Jr.

Mr. John W. Dixon

Mr. Richard Doornbos

Ms. Karen Edwards

Mr. Donald S. Elliott

Mrs. Sally Emde

Mr. William O. Emde

Mr. Albert Fay, Jr.

Mr. Jerry W. Freeman

Mrs. Margaret Folsom

Mr. Robert S. Folsom

Mr. K.L. Foree, Sr.

Mr. Wilton H. Fair

Mr. Frank Glover

Mr. Thomas E. Hartin

Mr. Hugh Halff, Jr.

Mr. Willard H. Hammonds

Mr. Paul K. Herder

Mrs. H. Wendell Hobbs

Mr. H. Wendell Hobbs

Mr. Harvey Huie

Mr. James C. Holcomb

Mr. Frank P. Horlock, Jr.

8904074352 7

Mr. Michael D. Hutchison

Mr. Thomas T. Keeler

Mrs. Frances W. Klein

Mrs. Joan Kunitz

Mrs. Ella M. Kellum

Mr. Joe B. Kercheville

Ms. G. Kimberly Klein

Mr. Louis W. Kreditor

Mrs. Jessie V. Kniveton

Mr. James E. Kellum

Mr. William David Lacy

Mrs. Beth Logue

Mr. A. Don Lummus

Mr. R.R. Lowdon

Mrs. Frank W. Mayborn

Mr. Frank Mayborn

Mrs. Carolyn McElyea

Gen. Sam Maddux, Jr.

Mrs. Geraldine Miller

Mr. Vance C. Miller

Mr. L.A. McNeil

Mr. Montana McKean

Mr. A.P. McEvoy

Hon. Eugene M. McElyea

Ms. Catherine W. McAnally

Mr. Walter M. Mischer

Mr. William H. Martin

8204074352 8

Mrs. Karen Martin

Mrs. Bettye Nowin

Mrs. Carl E. Oates

Mr. Carl E. Oates

Mr. Gene E. Overbeck

Mr. C.O. Overcash

Mr. Daniel T. Parker

Ms. Anne Pickens

Ms. Paige Pickens

Mrs. Elga Rea

Mr. Edward Rea

Dr. S.J. Rogers

Mr. T.L. Roach, Jr.

Ms. Laurie Ramsey

Mr. G.E. Roney

Mr. R.J. Schumacher

Mr. Weldon H. Smith

Mr. Richard T. Sink

Mr. John M. Stemmons

Mr. Arthur Seeligson, III

Mr. E. Trine Starnes

Mrs. Merle P. Stieler

Mrs. Pat Schiff

Mr. S.S. Seltzer, Jr.

Mrs. Cathy Sowers

Mr. J.T. Shelton

Mr. Herbert Schiff

Mr. John Sauer

3 3 0 4 0 7 4 3 5 2 9

Mr. Marvin Selig

Mr. Wayne Thomas

Mrs. David Tacke

Mr. Robert L. Triable

Mr. David R. Tacke

Mrs. Theresa Tapp

Mrs. Chester R. Upham, Jr.

Mrs. Esther Westby-Aus

Dr. Robert V. West, Jr.

Mr. John H. White

Mrs. Lellia Windom

Mr. Robert L. Wheelock, Jr.

Dr. Robert E. Windom

Mr. N.M. Yost

Mrs. H.B. Zachry, Jr.

Mr. B.S. Baker

Mr. Thomas M. Benson, Jr.

Mr. M.N. Bostick

Mr. E.B. Bottom

Mrs. Adelle Bottom

Mr. Hogan T. Brooks

Mr. Fred Brown

Mr. Robert J. Bruni

Mr. Sam Buchanan

Mr. Douglas M. Conlee

Mrs. Michelle K. Connor

Mr. Ames Lewis Connor III

8904074353O

Mr. Harold D. Courson

Mrs. Andrew Fasken

Mr. Ernest Bel Fay

Mr. P. Gill

Mr. George S. Hawn

Mrs. Edith Huebner

Mrs. H.L. Hunt

Mr. Ray L. Hunt

Mrs. Nancy A. Hunt

Mr. J.I. Jackson

Mr. Abe M. Katz

Mr. Frederick R. Meyer

Mrs. Drayton McLane, Jr.

Mr. Robert L. Bradley

Dr. R.A. Fox

Mr. Refugio Gonzales, Jr.

Mr. Walier M. Mischer, Jr.

Mrs. Anita Rogers

Mr. G.W. Sanford

Mr. Frank J. Scanio, Jr.

Mr. Ross Workman

Mrs. Mildred W. Simmons

Mrs. Edith Jones O'Donnell

8904074353 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donna Mobley
1404 East 37th
Austin, Texas 78722

Dear Ms. Mobley:

This letter is to acknowledge receipt of your complaint, which we received on October 30, 1984, which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent(s) will be notified of this complaint within 24 hours. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this Office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Please be advised that this matter shall remain confidential in accordance with 2 U.S.C. § 437g(a)(B) and § 437g(a)(12)(A) unless the respondent notifies the Commission in writing that they wish the matter to be made public.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure

2004074353 2

GCC# 5561

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005
TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN
WASHINGTON, D.C.

JAMES F. SCHOENER
(202) 789-8643

November 9, 1984

HAND DELIVERED

MUR 1837

Patty Reilly, Esquire
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Dear Ms. Reilly:

As counsel for the respondents Phil Gramm, Friends of Phil Gramm, Ruth Cymber and John Baxter, as the assistant treasurer and treasurer of the Friends of Phil Gramm, I have reviewed the Complaint filed October 30, 1984 and find that the volume of detail required to properly respond to this Complaint is such that we are unable to furnish such detail within the time set by the law and regulations.

We do, however, have sufficient information to indicate the following:

1. There was, in fact, an indebtedness left from the primary campaign in 1984 in excess of $200,000.

2. The exact amount of the indebtedness was not available at either of the reporting periods before the general election for a variety of reasons among which are:

   a. Bills were in several different campaign offices and had not yet been forwarded to the Washington, D.C. office;

   b. Several vendors had not sent bills although requested to do so several times. Subsequent requests similar to the attached letter have been sent to all vendors who have neglected to bill us;

   c. Several large bills were questioned and required further explanation, and consequently the committee did not know the amount owed.

3. The unanticipated volume of contributions required our installing a computerized reporting system in the middle of the campaign, which further complicated our reporting process.

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As is usual in large campaigns such as ours, we are further hampered because our staff has been reduced after Tuesday's election and many are on well deserved vacations. Any reason to expedite this matter is obviated by the election, and full disclosure of the Complaint was highly publicized prior to the election by the Complainant and Congressman Gramm's opponent. The need for an expedited response no longer exists.

We have retained the services of Mr. Stan Huckaby of Austin, Texas, a certified public accountant with considerable experience in Federal Election Commission matters, to obtain the exact figure that will indicate the debt as of each reporting date. This, of course, requires confirmation from a large number of creditors spread over a number of different cities in Texas and other parts of the country. When those exact figures can be obtained, we will file a response supported by relevant detail that will reply to the basic thrust of the Complaint, viz, the primary debt.

We have been contacted by a number of contributors to the Friends of Phil Gramm who have received copies of the Complaint and they have apparently been added as respondents, although not so named in the Complaint. I find this process surprising under the usual and normal practice of the Commission. Since the contributors would not be in violation when the primary debt is established, it appears to be a strange practice to have sent this voluminous Complaint to these many citizens who are not familiar with nor regularly involved with the type of the problem at issue. Nor could they respond to the allegations in any material manner.

For the reasons set forth above, the respondents we represent respectfully request an additional 30 days to file a certified report of the corrected outstanding indebtednesses at the two reporting periods involved. We will file specific answers to all of the other allegations. We further ask that the added contributor-respondents be allowed to avoid responding until the threshold question of the primary debt is determined.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener

JFS/cb

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PHIL
GRAMM
U.S. SENATE TEXAS

October 31, 1984

TO: All Vendors
FROM: Richard H. McBride - Campaign Manager
SUBJECT: Outstanding Bills

In order to assure that all bills are paid and to assure that we don't incur unexpected debts after the campaign, please send in all outstanding invoices as soon as possible. All bills received by November 10th will be paid on November 12th. All others will be paid by the first of next year.

If you have any questions, please call me at 512/458-2241.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1984

James F. Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

Re: MUR 1837
Friends of Phil Gramm and
John Baxter, as treasurer et al.

Dear Mr. Schoener:

This is in reference to your letter dated November 9, 1984, requesting an extension of 30 days to respond to the complaint filed with the Federal Election Commission against your clients. After considering the circumstances presented in your letter, the Commission has determined to grant your request. Accordingly, your response will be due on December 14, 1984.

Your request that the other respondents be allowed to avoid responding until the question of the primary debt is determined is under consideration by the Commission. You will be advised under separate cover when the Commission has reached such a determination.

If you have any questions, please contact Patty Reilly, the staff member assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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GCC# 5822
RECEIVED AT THE FEC

KWTX BROADCASTING COMPANY, INC.

4520 BOSQUE BLVD. P. O. BOX 7526 WACO, TEXAS 76710 PHONE 776-1330 AREA CODE 817

84 NOV 28 AM 11:24

KWTX-AM-FM-TV
WACO, TEXAS

KXII TV
ARDMORE, OKLAHOMA
SHERMAN, DENISON, TEXAS

KLFY TV
LAFAYETTE, LOUISIANA

KBTX TV
BRYAN, TEXAS

KNAL RADIO
VICTORIA, TEXAS

November 26, 1984

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D. C. 20463

84 NOV 29 P1:40

RE: MUR 1837

Dear Mr. Steele:

In the above referenced matter, the complaint alleges that I exceeded the legal limit of contributions to U. S. Senator Phil Gramm during his election campaigns. Specifically, the complaint states that on October 11, 1984 I contributed $1,000.00 plus $250.00. This was not a personal contribution, but a political contribution by KWTX Broadcasting Company.

I am President and General Manager of KWTX Broadcasting Company. This was a company contribution for which I was fully reimbursed. No violation occurred and I request that I be excluded from the proceeding relative to this matter.

Sincerely yours,

M. N. Bostick

M. N. Bostick
President
KWTX BROADCASTING COMPANY

MNB/dm

Subscribed and sworn to before me this

26th day of November, 1984

Frances Davis
Notary Public
In Waco, Texas, County of McLennan

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SENSITIVE

RECEIVED
OFFICE OF THE FEC
SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 NOV 20 P12:15

November 20, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

RE: Motion to Avoid Responding in MUR 1837

On November 1, 1984, the Office of the General Counsel notified the Commission of a complaint filed by Ms. Donna Mobley against the Friends of Phil Gramm Committee ("the Committee") and 171 other individuals. The complaint contained two allegations. First, it alleged the Committee failed to report outstanding debts and obligations on its 1984 July Quarterly Report. Alternatively, it stated the Committee received contributions designated for the primary election after the date of that election and at a time when no primay debts were outstanding. This latter allegation charges that the absence of a primary debt resulted in excessive contributions by individuals who had given the maximum to the general election and subsequently contributed to the primary.

Counsel for the candidate and his Committee, James F. Schoener, has filed an initial response. (See Attachment 1). It asserts the Committee had an outstanding debt at the conclusion of the primary, but requests additional time to compile a certified report showing this indebtness. Accordingly, this Office granted the Committee a 30 day extension in which to respond. Upon receipt of this response recommendations will be made to the Commission.

This initial response also requested that the "contributor-respondents be allowed to avoid responding until the threshold question of the primary debt is determined." The Office of the General Counsel recommends the Commission deny this motion for two reasons.

First, the Act stipulates that before the Commission conducts any vote on a complaint, other than a vote to dismiss, any person notified shall have the opportunity to demonstrate

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in writing to the Commission that no action should be taken on the complaint. Notified respondents have a 15 day period in which to make this showing. 2 U.S.C. § 437g(a)(1). The motion to avoid responding would deny individuals this statutory right and may also prevent the Commission from receiving information that could be useful in determining whether there is reason to believe the Act has been violated.

Secondly, Mr. Schoener is the designated counsel only for the candidate, the Committee and seventeen other respondents. Many other respondents have already designated other attorneys to represent them. Some of these respondents have already filed answers. Accordingly, it is inappropriate for the Committee's counsel to assert this motion on behalf of persons who are not his clients and who may have interests adverse to those of his clients.

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Recommendation

1. Deny the motion to avoid responding in MUR 1837.

Attachments

1. Initial Response of the Committee
2. Letter to James F. Schoener, Esquire

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: NOVEMBER 21, 1984

SUBJECT: OBJECTION - MUR 1837 Memorandum to the Commission dated November 20, 1984

The above-named document was circulated to the Commission on Tuesday, November 20, 1984 at 4:00.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	
Commissioner Elliott	X
Commissioner Harris	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Reiche	

This matter will be placed on the Executive Session agenda for Tuesday, November 27, 1984.

8904074335540

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1837
Friends of Phil Gramm Committee, et al.	)	
	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of November 27, 1984, do hereby certify that the Commission decided by a vote of 5-0 to deny the motion to avoid responding in MUR 1837.

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

Attest:

11-30-84
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 4, 1984

James F. Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteen Street, N.W.
Washington, D.C. 20005

Re: MUR 1837
The Friends of Phil Gramm

Dear Mr. Schoener:

This is in response to your motion that the respondents in the above matter be permitted to avoid responding until The Friends of Phil Gramm Committee has an opportunity to establish the existence of a primary debt. The Commission has considered this motion and has determined not to grant it.

If you have any questions, please contact Patty Reilly, the staff member assigned to this matter, at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 4, 1984

James F. Schoener, Esquire
Miller, Canfield, Paddock and Stone
1015 Fifteen Street, N.W.
Washington, D.C. 20005

Re: MUR 1837

Dear Mr. Schoener:

On November 9, 1984 this Office received from you a request for extensions of time for Senator Phil Gramm, the Friends of Phil Gramm, ("the Committee") and Ruth Cymber and John Baxter, treasurer and assistant treasurer to the Committee. Our letter of November 20, 1984 granted these extensions.

On November 15, 19, 20, and 26 this Office received letters from you indicating you are representing additional respondents in this matter. These letters listed the additional respondents and enclosed designation of counsel forms naming you as counsel to these respondents.

In your November 15 letter you stated that you assumed the 30 day extensions granted to you as counsel for the candidate, the Committee and the treasurers would apply to "the respondents who were added by the FEC." The Office of the General Counsel informed you by letter dated November 23, 1983 that the 30 day extensions only applied to the candidate, the Committee and the treasurers; however 15 day extensions were granted to other respondents represented by you who had filed designation of counsel forms and were listed in your letters of November 15 and 19.

In another letter also dated November 26, 1984, you requested extensions of time "for each of the respondents for whom I heretofore filed a Statement of Designation of Counsel, as well as those individuals who have designated me as counsel in a direct communication to your Commission." This Office has considered this request and will also grant 15 day extensions for the above-indicated respondents. Accordingly, 15 day extensions have been granted to those respondents listed in your earlier correspondence and to those who have independently represented to this Office that you are their attorney.

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This second letter of November 26, 1984 also requests extensions for individuals that you state wish to be represented by you, but from whom this Office has not received designation of counsel forms. Unless and until the Office of the General Counsel receives such designations, it cannot consider your requests for extensions on behalf of such individuals. Therefore, the requested 15 day extensions do not encompass any respondent who has not submitted a designation of counsel form indicating that you are representing him in this matter.

As of November 27, 1984, your clients must meet the following deadlines. The Committee, candidate, and treasurers have been granted 30 day extensions. Their responses are due on December 14, 1984. Clients listed in the November 15, 19, 20 and 26 letters who have filed designation of counsel forms or have indicated to this Office that you are their attorney have also been granted 15 day extensions. Accordingly, their responses are due 30 days after the date each individual was notified by the Commission of the complaint.

If you have any questions, please contact Patty Reilly, the staff member assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8204074355 44

SENSITIVE

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

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

1984 DEC 31 AM 9:54

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 12/31/84
10:00

MUR 1837
DATE COMPLAINT RECEIVED BY
OGC November 1, 1984
DATE OF NOTIFICATION TO
RESPONDENTS November 5, 1984
STAFF MEMBER Reilly

COMPLAINANT'S NAME: Donna Mobley

RESPONDENTS' NAMES: Representative Phil Gramm
The Friends of Phil Gramm and
Ruth Cymber, as Assistant Treasurer,
and John Baxter, as treasurer
The American Bankers Association BankPAC
American Family PAC
Union Pacific Fund
Houston Industries Political Action Committee
Tennaco Employees Good Government Fund
National Home Builders PAC
Texas Republican Congressional Committee
David Crowley
John Stemmons, Jr.
159 other individuals*

RELEVANT STATUTE: 2 U.S.C. § 441a(a)
2 U.S.C. § 434b(8)

INTERNAL REPORTS CHECKED: Disclosure Reports

SUMMARY OF ALLEGATIONS

On November 1, 1984, the Office of the General Counsel notified the Commission of a complaint filed by Ms. Donna Mobley against the Friends of Phil Gramm Committee ("the Committee") and 171 other individuals and committees. The complaint contained two allegations. First, it alleged the Committee failed to report outstanding debts and obligations on its 1984 July Quarterly Report. Alternatively, it stated the Committee

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* See attachments

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received contributions designated for the primary election after the date of that election and at a time when no primay debts were outstanding. This latter allegation charges that the absence of a primary debt resulted in excessive contributions by individuals and committees who had given the maximum to the general election and subsequently contributed to the primary.

STATUS OF THE MURS

Counsel for the candidate and his Committee, James F. Schoener, filed an initial response. It asserts the Committee had an outstanding debt at the conclusion of the primary, but requested additional time to compile a certified report showing this indebtness. Accordingly, this Office granted the Committee a 30 day extension in which to respond. Other respondents also represented by Mr. Schoener received 15 day extensions of the period of time in which to respond. Mr. Schoener's request that respondents other than the Committee be permitted to "avoid responding until the threshold question of the primary debt is determined" was denied by the Commission on November 27, 1984.

The Commission submitted a voluminous certified response on December 14, 1984. In addition, Mr. Schoener filed a response on behalf of most of the other respondents on December 3, 1984. Throughout December, this Office has received a number of other

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responses from other respondents with independent counsel. Upon evaluating all of these responses, this Office will further report to the Commission with appropriate recommendations.

Charles N. Steele
General Counsel

Dec. 28, 1987
Date

By: _____
Kenneth A. Gross
Associate General Counsel

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Attachment
List of Respondents

Attachment 1

The following is a listing of the 159 other respondents in MUR 1837.

Mrs. Maragret Alkek

Mr. Alvis Arthur

Mr. James W. Arnold

Dr. William L. Anderson

Mrs. Helen Allen

Mr. C. J. Allen

Mr. Roland Arthur

Mrs. Ebby Halliday Acers

Mrs. Helen Bankston

Mr. Louis A. Beecher I, Jr.

Mr. D. Phil Bolin

Mr. D.E. Brand

Mr. L.D. Brinkman

Mrs. L. D. Brinkman

Mr. B.G. Brookshire

Mr. William E. Burford

Mr. L.D. Burns

Mr. George W. Bush

Mrs. Elloine M. Calder

Mr. Bruce Calder

Mr. Arthur Cary

Mr. Gene F. Canavan

Mr. Donald M. Carlton

Mr. Frank Cass

Mr. William G. Cass

Mrs. Mary Cass

Mr. Michael L. Cass

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Mr. W. Allen Custard

Dr. William H. Crain

Mr. Roy C. Coffee

Mr. Joel Daniel

Mr. Gilbert M. Denman, Jr.

Mr. John W. Dixon

Mr. Richard Doornbos

Ms. Karen Edwards

Mr. Donald S. Elliott

Mrs. Sally Emde

Mr. William O. Emde

Mr. Albert Fay, Jr.

Mr. Jerry W. Freeman

Mrs. Margaret Folsom

Mr. Robert S. Folsom

Mr. K.L. Foree, Sr.

Mr. Wilton H. Fair

Mr. Frank Glover

Mr. Thomas E. Hartin

Mr. Hugh Halff, Jr.

Mr. Willard H. Hammonds

Mr. Paul K. Herder

Mrs. H. Wendell Hobbs

Mr. H. Wendell Hobbs

Mr. Harvey Huie

Mr. James C. Holcomb

Mr. Frank P. Horlock, Jr.

2004074549

Mr. Michael D. Hutchison

Mr. Thomas T. Keeler

Mrs. Frances W. Klein

Mrs. Joan Kunitz

Mrs. Ella M. Kellum

Mr. Joe B. Kercheville

Ms. G. Kimberly Klein

Mr. Louis W. Kreditor

Mrs. Jessie V. Kniveton

Mr. James E. Kellum

Mr. William David Lacy

Mrs. Beth Logue

Mr. A. Don Lummus

Mr. R.R. Lowdon

Mrs. Frank W. Mayborn

Mr. Frank Mayborn

Mrs. Carolyn McElyea

Gen. Sam Maddux, Jr.

Mrs. Geraldine Miller

Mr. Vance C. Miller

Mr. L.A. McNeil

Mr. Montana McKean

Mr. A.P. McEvoy

Hon. Eugene M. McElyea

Ms. Catherine W. McAnally

Mr. Walter M. Mischer

Mr. William H. Martin

R 9 0 4 0 7 4 3 5 5 0

Mrs. Karen Martin

Mrs. Bettye Nowin

Mrs. Carl E. Oates

Mr. Carl E. Oates

Mr. Gene E. Overbeck

Mr. C.O. Overcash

Mr. Daniel T. Parker

Ms. Anne Pickens

Ms. Paige Pickens

Mrs. Elga Rea

Mr. Edward Rea

Dr. S.J. Rogers

Mr. T.L. Roach, Jr.

Ms. Laurie Ramsey

Mr. G.E. Roney

Mr. R.J. Schumacher

Mr. Weldon H. Smith

Mr. Richard T. Sink

Mr. John M. Stemmons

Mr. Arthur Seeligson, III

Mr. E. Trine Starnes

Mrs. Merle P. Stieler

Mrs. Pat Schiff

Mr. S.S. Seltzer, Jr.

Mrs. Cathy Sowers

Mr. J.T. Shelton

Mr. Herbert Schiff

Mr. John Sauer

8904074351

Mr. Marvin Selig

Mr. Wayne Thomas

Mrs. David Tacke

Mr. Robert L. Triable

Mr. David R. Tacke

Mrs. Theresa Tapp

Mrs. Chester R. Upham, Jr.

Mrs. Esther Westby-Aus

Dr. Robert V. West, Jr.

Mr. John H. White

Mrs. Lellia Windom

Mr. Robert L. Wheelock, Jr.

Dr. Robert E. Windom

Mr. N.M. Yost

Mrs. H.B. Zachry, Jr.

Mr. B.S. Baker

Mr. Thomas M. Benson, Jr.

Mr. M.N. Bostick

Mr. E.B. Bottom

Mrs. Adelle Bottom

Mr. Hogan T. Brooks

Mr. Fred Brown

Mr. Robert J. Bruni

Mr. Sam Buchanan

Mr. Douglas M. Conlee

Mrs. Michelle K. Connor

Mr. Ames Lewis Connor III

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Mr. Harold D. Courson

Mrs. Andrew Fasken

Mr. Ernest Bel Fay

Mr. P. Gill

Mr. George S. Hawn

Mrs. Edith Huebner

Mrs. H.L. Hunt

Mr. Ray L. Hunt

Mrs. Nancy A. Hunt

Mr. J.I. Jackson

Mr. Abe M. Katz

Mr. Frederick R. Meyer

Mrs. Drayton McLane, Jr.

Mr. Robert L. Bradley

Dr. R.A. Fox

Mr. Refugio Gonzales, Jr.

Mr. Walier M. Mischer, Jr.

Mrs. Anita Rogers

Mr. G.W. Sanford

Mr. Frank J. Scanio, Jr.

Mr. Ross Workman

Mrs. Mildred W. Simmons

Mrs. Edith Jones O'Donnell

8904074355 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: JANUARY 3, 1985

SUBJECT: MUR 1837 - First General Counsel's Report signed December 28, 1984

The above-captioned matter was circulated to the Commission on a 24 hour no-objection basis at 4:00, December 31, 1984.

There were no objections to the First General Counsel's Report at the time of the deadline.

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GCC#5963

RECEIVED BY THE FEC

HAND DELIVERED

84 DEC 14 A10:25

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005
TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

December 14, 1984

HAND DELIVERED

Patty Reilly, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: Mobley v. Friends of Phil Gramm
MUR 1837

Dear Ms. Reilly:

I am hand deliverying to you today the response of Friends of Phil Gramm, Phil Gramm, Ruth Cymber, John Baxter. This response includes Exhibit A (Affidavit of John Baxter), an Analysis of Primary Debt, Exhibit B (a computer printout of primary contributors after May 5, 1984) and Exhibits C-1, C-2, C-3 and C-4, which are cancelled checks for payment of primary debts and Exhibit C-5, as yet unpaid invoices arising from the primary. In addition, Exhibits D-1, D-2 and D-3 are submitted as amendments to the previously filed July 15, October 15, and 12-day pre-general election FEC reports, respectively. If you desire such amendments filed with the Secretary of the Senate rather than your office, please advise, and I will pick up those amendments and refile.

As I offered earlier, our Certified Public Accountant was available today to review any questions you might have on our procedures involved in this response. However, I may be able to explain if you have questions; or, if you believe a conference is required, we will arrange to have Mr. Huckaby return to Washington.

As I concluded in our response, we admit the Committee omitted its primary debt schedules, but with these amendments we believe that all issues are exposed and that conciliation efforts could be undertaken forthwith.

On behalf of my clients, Senator-elect Gramm, his Committee and its treasurers, we are prepared to conciliate at your convenience.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb
Enclosures

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In The
FEDERAL ELECTION COMMISSION

DONNA MOBLEY,

Complainant,

vs. M.U.R. 1837

FRIENDS OF PHIL GRAMM,
PHIL GRAMM, RUTH CYMBER
and JOHN BAXTER,

Respondents.

COME NOW respondents, Friends of Phil Gramm, Phil Gramm, Ruth Cymber, and John Baxter, by their counsel, Miller, Canfield, Paddock and Stone, and respond to complainant's charges as follows:

I. Answering paragraph I: Respondents admit the allegations therein contained, except as to the matters concerning Donna Mobley and as to those matters, they have no information or belief.

II. Answering paragraph II: Respondents admit that a July 15th report was filed with no reported debts or obligations (schedule D) for Friends of Phil Gramm, but say that the same was inadvertent and due to a confusion over the nature of (as yet) unbilled and unascertained primary obligations. (See attached affidavit of John Baxter marked as Exhibit A). Further answering the so-called "brag allegation" respondents say that all anticipated -- and as of that time unascertained -- debts and obligations from the primary election were less than funds then on hand or reasonably anticipated, that could have been used to pay such obligations.

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III. Answering paragraph III: Respondents admit that Friends of Phil Gramm accepted contributions toward the payment of primary debts and obligations, and that the same were accepted in the belief that insufficient funds specifically attributed for the primary obligations had been raised. Such fundraising is permitted under FEC regulation §110.1(a)(2)(i). It is still the information and belief of respondents that insufficient funds to retire all primary obligations have been raised and that ultimately other funds will have to be raised to pay such debts. (See "Analysis of Primary Debt," attached.)

IV. Answering paragraph IV: Respondents admit that there was a primary debt, and also admit that at the time of filing these reports the precise and correct amounts were unavailable. Consequently, the schedule of debts was left blank on the F.E.C. forms. Respondents deny that payment of primary debts or obligations has not been shown, but admit that such payments were not specifically itemized as to whether they were incurred in the primary or general election; the detail in the attached analysis of debt breaks out the primary debts paid during the reporting periods. (See Exhibits C-1 through C-4.)

V. Answering paragraph V: Respondents deny any violation of contribution limitation.

VI. Answering paragraph VI: Respondents deny any violation of contributions limitation whatsoever, willfully or inadvertently, but admit that Friends of Phil Gramm did receive contributions after the primary date to be used to pay the primary debts and obligations.

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VII. Answering paragraph VII: Respondents admit that the schedule of debts and obligations in the two reports (schedule D) was left blank since the exact amounts had not been billed and the totals were unknown, but deny that such omission constitutes willful and knowing violation of the laws and regulations. No loans or substantial fixed contractual obligations were known to exist at the time of filing either of the said reports; however, when said primary obligations were fixed and paid they were duly and properly reported, as complainant obviously knows as appears from the example in her allegations in paragraph IX of her complaint.

VIII. As to the allegations contained in paragraph VIII, the same are irrelevant and argumentative and need not be answered.

IX. Answering paragraph IX: As complainant obviously recognized the two large claims alleged in this paragraph constituted a large part of the primary obligations, and when the same were presented, documented and agreed upon, they were paid. The exact amount of those obligations and other subsequent claims filed was not known at the time of filing the relevant reports. Attached hereto as Exhibits B and C-1 through C-5 are the summary and correct documentation of the primary debt analysis.

X. The allegations of paragraph X are ridiculous and erroneous and not worthy of answer as may be determined by the Commission's examination of the record of MUR 1672. Such allegations are irrelevant to this Complaint.

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XI. Attached hereto are amendments (Exhibits D-1, D-2 and D-3) to the specific allegations in paragraph XI and respondents say most of such accounting errors were due to typographical errors in the preparation of these reports.

XII. The above-referenced amendments include the revised schedule D of the Friends of Phil Gramm for July 15, October 15, and 12th day report preceding general election.

Respondents further say the following:

1. The schedule D of debts and obligations in the original filings were left blank for the reason that the amounts were as yet unliquidated, undocumented, and/or unknown.
2. Attached are amended schedules D showing the correct figures for debts and obligations which indicates a primary debt in excess of the primary contributions contained in the subsequent schedule of contributions.
3. Attached is a revised and amended schedule of contributions contained in complainants' paragraph XI as we believe will correspond to the filed reports of the first three respondents and information from the last two individual respondents.
4. Upon the reception of these amendments respondent Friends of Phil Gramm admits failure to file completed Schedule D or to have indicated the primary debts to extent such debts were known.

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5. Respondents to this complaint aver that individual contributors listed by complainant made primary contributions after May 5, 1984 based upon assurances from Friends of Phil Gramm that there was in fact a primary debt. Such contributions as were made were given and accepted in a good faith belief of the existence of such primary debt. Friends of Phil Gramm further assured such contributors that if no primary debt existed the contribution would be refunded, but since a primary debt is shown in this response, no such refund is required.

WHEREFORE, respondents pray this Commission enter into a pre-cause to believe conciliation for such reporting omissions without further involvement of individual contributors.

Respectfully submitted,

FRIENDS OF PHIL GRAMM, PHIL GRAMM,
RUTH CYMBER and JOHN BAXTER, Respondents

By James F. Schoener

James F. Schoener, Esq.
Miller, Canfield, Paddock and Stone
Counsel for Respondents
Suite 1200, 1015 15th Street, N.W.
Washington, DC 20005
(202) 789-8640

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- EXHIBIT A

Before the

FEDERAL ELECTION COMMISSION

STATE OF TEXAS)
) SS AFFIDAVIT
COUNTY OF DALLAS) MUR 1837

JOHN BAXTER, being duly sworn, deposes and says as follows:

1. That he is the Treasurer of Friends of Phil Gramm, the principal campaign committee of Phil Gramm, candidate for United States Senator from Texas, in 1984.
2. The July 15, 1984 quarterly report and the October 15, 1984 quarterly report were filed by the assistant treasurer, but were reviewed by him.
3. That in the review of such reports he assumed that the law and regulations did not require bills and accounts which he considered to be "trade accounts" to be scheduled as "debts and obligations"; he further assumed that trade accounts were those that by their terms and conditions were payable in 30, 60 or 90 days.
4. His understanding of "debts and obligations" was that borrowed money or overdue trade accounts not paid in a timely fashion were includable.
5. He is now advised that this interpretation was in error and has proceeded to correct and amend all reports in accordance with F.E.C. accounting practices.

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6. That during the campaign, bills for primary obligations continued to be received by the committee up to and even after the general election, and generally have been paid as submitted. He is informed and believes that there are still unknown primary election obligations that have not as yet been billed to the Committee, although all known creditors have been asked to submit their bills promptly.

Further deponent sayeth not:

FRIENDS OF PHIL GRAMM

By John Baxter

John Baxter, Treasurer

Sworn to and subscribed before me a Notary Public, in and for the State of Texas, This 11th day of December, 1984.

Deborah Mellody

Notary Public Texas

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DEBT

FRIENDS OF PHIL GRAMM

ANALYSIS OF PRIMARY DEBT
5-06-84 through 10-17-84

CASH BALANCE 5-06-84	$ 199,256.13
Plus PRIMARY RECIEPTS 5-06-84 thru 10-17-84 (See attached Exhibit B)	384,118.59
Less PRIMARY EXPENSES PAID AND BILLS STILL OUTSTANDING 5-06-84 (See attached Exhibits C-1 thru C-5)	(630,222.66)
ACTUAL PRIMARY DEBT AS OF 10-17-84	$ (46,847.94)

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* Legal, accounting and fundraising expenses attributable to the primary cycle which are known to exist but are as yet unbilled are not included.

EXHIBIT B

12/13/84 MAY PRIMARY 5/7 - 10/17 PAGE 1

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
DILL072500002	507	0	300.00	Mr.	A. W. Dillard, Jr.	725 Western United Life Bldg	Midland
MAUL121900001	507	0	1000.00	Mr.	Sid M. Mauldin, Jr.	P. O. Box 12199	San Antonio
OSWA140600001	507	0	1000.00	Mr.	N. D. Oswald	1406 Braewood	Duncanville
OSWA140600101	507	0	1000.00	Mrs.	N. D. Oswald	1406 Braewood	Duncanville
OSWA140600201	507	0	1000.00	Ms.	Laura D. Oswald	1406 Braewood	Duncanville
OSWA140600301	507	0	1000.00	Mr.	Glenn K. Oswald	1406 Braewood	Duncanville
OSWA140600401	507	0	1000.00	Ms.	Julie Lynn Oswald	1406 Braewood	Duncanville
PAC 030200004	507	0	1500.00	The	Fund for a Conservative	Majority Federal Fund	Washington
PAC 040000001	507	0	250.00	The	Texas Utilities Electric Co.	TUBCO Div. PAC	Dallas
PAC 200101001	507	0	250.00	The	Texas Utilities Co. PAC	2001 Bryan Tower, 19th Floor	Dallas
PAC 230800001	507	0	500.00	The	Varmicon Industries PAC	P. O. Box 2308	Harlingen
PAC 393900001	507	0	200.00	The	Miller Brewing Company	Federal Committee	Milwaukee
PAC 777701001	507	0	4000.00	The	American Space Frontier	Committee	Falls Church
CAMP092300201	508	0	125.00	Mrs.	Anne M. Campbell	923 West Harvester	Pampa
DAKI601000001	508	0	1000.00	Mr.	Floyd A. Dakil	6010 Walnut Hill Lane	Dallas
DAKI601000101	508	0	1000.00	Mrs.	Diane Dakil	6010 Walnut Hill Lane	Dallas
DORE561300002	508	0	100.00	Mr.	John L. Dore	5613 Cedar Creek	Houston

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PAC 120000001	508	0	1000.00	The	General Mills PAC	1200 New Hampshire Ave. N.W.	Washington
PAYN431600101	508	0	400.00	Mr.	Robert B. Payne	4316 Arcady	Dallas
PENS462500003	508	0	250.00	Mr.	John G. Penson	4625 InterFirst Two	Dallas
SAMU321700001	508	0	1000.00	Mrs.	J. M. Samuel	3217 - 19th Street	Lubbock
STAL090000101	508	0	200.00	Mrs.	Anne Stallworth	900 Hartford Building	Dallas
CROW102600001	509	0	1000.00	Mrs.	Mary C. Crowley	10265 Inwood Road	Dallas
PAC 133800001	510	0	5000.00	The	Flowers Industries PAC	P. O. Box 1338	Thomasville
PAC 590500001	510	0	100.00	The	Greater Clear Lake Bay Area	Political Action Committee	Houston
PAC 833000001	511	0	1000.00	The	Public Service PAC	8330 Old Courthouse Road	Vienna
PAC 870100002	511	0	1000.00	The	A MAMA P/T PAC	8701 Bedford Euless Road	Hurst
SINK000500001	511	0	243.20	Mrs.	Rebecca L. Sink	5 Brenna	Wichita Falls
ATHE031500001	514	0	500.00	Mrs.	Flora C. Atherton	315 Westover	San Antonio
HAWN154000001	514	0	1000.00	Mr.	W. R. Hawn	1540 Republic Bank Building	Dallas
PAC 091900001	514	0	5000.00	The	Campaign America	919 Prince Street	Alexandria
PAC 107200001	514	0	500.00	The	PAN PAC	State National Bank	El Paso
GALI301500001	515	0	1000.00	Mr.	R.A. Galindo	3015 Hummingbird Circle	Bryan
HASS012900001	515	0	500.00	Mr.	James C. Hasslocher	129 Haskin Road	San Antonio

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
JOHN255100001	515	0	1000.00	Mr.	J. Willis Johnson	P. O. Box 2551	San Angelo

8 9 0 4 0 7 4 5 6 5

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
JOHN255100001	515	0	1000.00	Mr.	J. Willis Johnson	P. O. Box 2551	San Angelo
PAC 100300001	518	0	25.00	The	Furniture PAC	Box 1003	High Point
PAC 125300001	522	0	5000.00	The	Citizens for the Republic	1253 7th Street, #200	Santa Monica
CRAW170000001	524	0	1000.00	Mr.	Ronald Crawford	1700 K Street, N.W.	Washington
WILL037800001	524	0	1000.00	Mrs.	Marguerite N. Williams	P. O. Box 378	Thomasville
JONE060000001	525	0	500.00	Mr.	W. W. Jones	600 W. W. Jones Building	Corpus Christi
PAC 160001001	529	0	4950.00	The	NRA Political Victory Fund	1600 Rhode Island Ave., NW	Washington
HILL352500001	530	0	1000.00	Mr.	Al G. Hill	3525 Turtle Creek Blvd.	Dallas
HILL352500101	530	0	1000.00	Mrs.	Al G. Hill	3525 Turtle Creek Blvd.	Dallas
LITT160500001	530	0	500.00	Mr.	George S. Littell	1605 Woodhead	Houston
HADE300600101	531	0	1000.00	Mr.	Cecil R. Haden	P. O. Box 3006	Houston
OLIV606000101	531	0	100.00	Mrs.	Frances Oliver	6060 N. Central Expressway	Dallas
RICK370100001	531	0	25.00	Mr.	R. D. Ricketts	3701 Kirbey Building	Houston
SHAR242100001	531	0	1000.00	Mr.	Dudley C. Sharp	2421 Bank of the S.W. Bldg.	Houston
VAUG084400001	531	0	1000.00	Mr.	Michael J. Vaughn	P.O. Box 844	Waco
FORD148000001	601	0	1000.00	Mr.	Kenneth A. Ford	14800 San Pedro Street	San Antonio
PAC 255800001	601	0	1000.00	The	Texas Commerce Bancshares	PAC	Houston

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PAC 340000002	601	0	2500.00	The	League For Effective Govermt	3400 Texas Commerce Tower	Houston

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PAC 340000002	601	0	2500.00	The	League For Effective Governmt	3400 Texas Commerce Tower	Houston
BROD126500001	602	0	1000.00	Mr.	Frederick Brodsky	12655 North Central Expwy.	Dallas
SCUR464800001	602	0	1000.00	Mr.	E.C. Scurlock	P. O. Box 4648	Houston
SHAR242100101	602	0	1000.00	Mrs.	Tina Sharp	2421 Bank of the S.W. Bldg.	Houston
VAUG060600001	602	0	1000.00	Mr.	Grady H. Vaughn	606 Mercantile Dallas Bldg.	Dallas
BONH102500001	604	0	1000.00	Mr.	Donald L. Bonham	1025 Glourie Circle	Houston
CHAP011700002	604	0	500.00	Mr.	John O. Chapman	P.O. Box 117	Chapman Ranch
HURD150000001	604	0	1000.00	Hon.	John G. Hurd	1500 National Bank of Commer	San Antonio
MARQ142600001	604	0	25.00	Mr.	Rafael B. Marquez	1426 20th Avenue North	Texas City
REAV453300001	604	0	1000.00	Mr.	Travis Reaves	4533 Pasadena Blvd.	Houston
MOTL380100001	606	0	15.00	Mrs.	Becky Motley	3801 Fleetwood	Amarillo
HAWK150000101	607	0	100.00	Mrs.	Susan M. Hawkins	1500 Diamond Shamrock Tower	Dallas
COLE025000001	608	0	1000.00	Mr.	Sheldon Coleman	250 North St. Francis	Wichita
MYER392500001	608	0	1000.00	Mr.	Mike A. Myers	3925 Druid	Dallas
MYER392500101	608	0	1000.00	Mrs.	Mike A. Myers	3925 Druid	Dallas
ORSI451500002	608	0	500.00	Mr.	Charles G. Orsinger	4515 San Pedro	San Antonio
PAC 299000002	608	0	1000.00	The	EXPAC	P. O. Box 299008	Houston

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
BAXT120000001	613	0	1000.00	Mr.	Murphy H. Baxter	1200 Smith Street	Houston
[illegible]	617	0	1000.00	Mr.	[illegible]	[illegible] Suite 4960	

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
BAXT120000001	613	0	1000.00	Mr.	Murphy H. Baxter	1200 Smith Street	Houston
BENT033300001	613	0	1000.00	Mr.	F. Fox Benton,Jr.	333 Clay, Suite 4960	Houston
CARM070000003	613	0	500.00	Mr.	David M. Carmichael	700 Rusk Avenue	Houston
CROS375600001	613	0	1000.00	Mrs.	H. Markley Crosswell,Jr.	3756 Knollwood Drive	Houston
CROS375600101	613	0	1000.00	Mr.	H. Markley Crosswell,Jr.	3756 Knollwood Drive	Houston
DAVI058100001	613	0	25.00	Mr.	Henry David	581 San Jacinto Building	Houston
HUDS543300001	613	0	1000.00	Mr.	E.J. Hudson	5433 Westheimer, #1101	Houston
HUFF445500001	613	0	1000.00	Mr.	Michael Huffington	P.O. Box 4455	Houston
KILR190800001	613	0	1000.00	Mr.	W.S. Kilroy	1908 First City Natl. Bank B	Houston
LAW 071300001	613	0	1000.00	Mrs.	Caroline W. Law	713 River Oaks Bank Tower	Houston
LENT213800001	613	0	1000.00	Mr.	M.R. Lents	2138 Bank of the SW Building	Houston
O'SH164200001	613	0	1000.00	Mr.	R.L. O'Shields	P.O. Box 1642	Houston
PAC 268000001	613	0	1000.00	The	American Electronics	Association Electopac	Palo Alto
PAC 304400001	613	0	2000.00	The	General Motors	Civic Involvement Program	Detroit
PRYO477000001	613	0	1000.00	Mr.	William E. Pryor	4770 Republic Bank Center	Houston
SMIT750000002	613	0	500.00	Mr.	Weldon H. Smith	7500 San Felipe	Houston
UNDE364500001	613	0	1000.00	Mrs.	Lynda K. Underwood	3645 Willowwick	Houston

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
WILS149200001	613	0	1000.00	Mr.	Wallace S. Wilson	P.O. Box 1492	Houston
HOLT220000002	614	0	25.00	Mr.	J. W. Holt	2200 Southwest Freeway	

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
WILS149200001	613	0	1000.00	Mr.	Wallace S. Wilson	P.O. Box 1492	Houston
HOLT220000002	614	0	25.00	Mr.	J. W. Holt	2200 Southwest Freeway	Houston
VALE660400001	614	0	500.00	Mrs.	Rose Valentinitsch	6604 Greenbriar	Houston
ALLE121200001	615	0	1000.00	Mr.	Herbert Allen	P. O. Box 1212	Houston
BUTC010100001	615	0	1000.00	Mr.	Preston Butcher	101 Lincoln Centre Drive	Foster City
PAC 118800002	615	0	1000.00	The	HNG Political Action Comm.	P. O. Box 1188	Houston
PAC 147800002	615	0	2000.00	The	United Energy Resources, Inc	Political Action Committee	Houston
PAC 192200003	615	0	2500.00	The	National Association of	Life Underwriters PAC	Washington
ROSE462300001	615	0	1000.00	Mr.	Michael Rose	4623 West Alabama	Houston
HARL020300001	618	0	1000.00	Dr.	Raymond Harle	203 Gardenview	San Antonio
PAC 000300002	620	0	2000.00	The	Brownbuilders PAC	P. O. Box 3	Houston
PAC 033301001	620	0	1000.00	The	Texas Air Corporation PAC	333 Clay Street, Suite 4040	Houston
PAC 050100002	620	0	1000.00	The	Responsible Government Assoc	501 W. 6th Street	Fort Worth
PAC 060002003	620	0	2000.00	The	Independent Insurance Agents	Political Action Committee	Washington
PAC 180002002	620	0	1000.00	The	MAPCO PAC	1800 S. Baltimore	Tulsa
PAC 272700001	620	0	2000.00	The	American General PAC	Attn: Bud Schauerte	Houston
AVER136500001	621	0	1000.00	Mrs.	Asenath M. Averyt	P.O. Box 1365	Columbia

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
BROW081000001	621	0	500.00	Mr.	Henry B. Brown	810 Seventh Avenue	New York

6 9 5 4 0 4 0 6

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
BROW081000001	621	0	500.00	Mr.	Henry B.R. Brown	810 Seventh Avenue	New York
COLE460000001	621	0	1000.00	Dr.	Frank C. Coleman	Medical Arts Center	Tampa
DAVI007000001	621	0	1000.00	Hon.	Shelby C. Davis	Shelby C. Davis & Company	New York
FREE300300001	621	0	1000.00	Mr.	Richard J. Freeland	3003 LaBalme Trail	Fort Wayne
GARR010600101	621	0	1000.00	Mrs.	J. T. Garrett	P. O. Box 106	Danbury
HOWE500500001	621	0	1000.00	Mr.	John B. Howenstine	5005 Riverway, Suite 500	Houston
HUX 095100001	621	0	1000.00	Mr.	Vernon E. Hux	Tri-Industries, Inc.	Terre Haute
KETE251100001	621	0	1000.00	Mr.	James L. Ketelsen	P.O. Box 2511	Houston
KETE251100101	621	0	1000.00	Mrs.	James L. Ketelsen	P.O. Box 2511	Houston
KNOB030500001	621	0	1000.00	Mr.	Carl W. Knobloch,Jr.	Production Operators Corpora	Atlanta
LAND000201001	621	0	1000.00	Dr.	Ralph Landau	Listowel, Inc.	New York
MANF840100001	621	0	1000.00	Mr.	Robert T. Manfuso	Manfuso Brothers, Inc.	Chevy Chase
MANF849100001	621	0	1000.00	Mr.	John A. Manfuso,Jr.	Manfuso Brothers, Inc.	Chevy Chase
NEUH110000001	621	0	1000.00	Mr.	H.V. Neuhaus,Jr.	1100 Louisiana	Houston
PLAT129400001	621	0	1000.00	Mr.	Richard M. Plato	12941 I-45 North	Houston
SHER173500001	621	0	1000.00	Mr.	Dale Sherwin	Dale Sherwin Associates	Washington
SUTH363600001	621	0	1000.00	Mr.	Robert B. Sutherlin	Audubon Federal S&L Associat	New Orleans

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
SUTH363600101	621	0	1000.00	Mrs.	Robert B. Sutherlin	Audubon Federal S&L Associat	New Orleans
WILL157700001	621	0	1000.00	Mr.	Thomas L. Williams,III	P. O. Box 1577	

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
SUTH363600101	621	0	1000.00	Mrs.	Robert B. Sutherlin	Audubon Federal S&L Associat	New Orleans
WILL157700001	621	0	1000.00	Mr.	Thomas L. Williams,III	P.O. Box 1577	Thomasville
COLL693400001	622	0	1000.00	Mr.	J.T. Collins	6934 Leameadow Drive	Dallas
PAC 280900001	625	0	1000.00	The	The National Good Gov. Fund	2809 First City Tower	Houston
DAVI344700001	626	0	100.00	Mr.	Steve Davidson	P. O. Box 3447	Midland
FING031800001	626	0	1000.00	Mr.	Jerry E. Finger	318 Timberwilde	Houston
BUTL081900001	627	0	1000.00	Mr.	John R. Butler,Jr.	819 Briar Ridge	Houston
HUDS222900002	627	0	50.00	Mr.	W.H. Hudson	2229 South Chilton	Tyler
MOSB223800001	627	0	1000.00	Mr.	Robert A. Mosbacher,Jr.	2238 Quenby	Houston
PAC 833000002	627	0	4000.00	The	Public Service PAC	8330 Old Courthouse Road	Vienna
STED273800001	627	0	1000.00	Ms.	Betty A. Stedman	P.O. Box 27389	Houston
PAC 260002001	629	0	5000.00	The	Harris FEPAC	2600 Virginia Ave., NW	Washington
FRAN237000001	702	0	1000.00	Hon.	Kenneth Franzheim	2370 Goesource Plaza	Houston
HORL526000001	702	0	500.00	Mr.	Frank P. Horlock, Jr.	P. O. Box 52608	Houston
PAC 200101002	702	30	1000.00	The	Texas Utilities Co. PAC	2001 Bryan Tower, 19th Floor	Dallas
PAC 226300003	702	30	1000.00	The	EM-PAC	P. O. Box 226331	Dallas
SANF008000001	705	0	1000.00	Mr.	G.W. Sanford,Jr.	P.O. Box 80	Temple

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
DANI130200002	706	0	785.00	Mr.	Haile N. Daniel	1302 Willow Pond	Abilene

8 0 0 4 0 7 4 2 5 7 1

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
DANI130200002	706	0	785.00	Mr.	Haile N. Daniel	1302 Willow Pond	Abilene
ROGE100400003	709	0	100.00	Mr.	Henry H. Rogers	1004 West Grove	Lufkin
WOOD478700005	709	0	100.00	Mrs.	Carolyn B. Wood	4787 Ocean Drive	Corpus Christi
PAC 055100003	709	30	3700.00	The	Lockheed PAC	Box 551	Burbank
ELLI686700002	710	0	50.00	Mr.	Donald S. Elliott	P. O. Box 6867	San Antonio
FOLS164700101	711	0	1000.00	Mrs.	Margaret Folsom	16475 Dallas Parkway	Dallas
BUTL070000004	711	20	50.00	Dr.	O. D. Butler	700 Thomas	College Station
FAHE490000004	711	20	100.00	Dr.	James F. Fahey, Jr.	4900 West Highway 31	Corsicana
GILL042500004	711	20	50.00	Col.	H.W. Gillespie	425 Spaceway Drive	San Antonio
KURT012600001	711	20	50.00	Dr.	Irwin Kurtz	126 Spyglass Hill	Port Lavaca
LACY321000201	711	20	100.00	Mrs.	Walter G. Lacy, Jr.	3210 Wooded Aires	Waco
LAND080300002	711	20	50.00	Dr.	Carl W. Landiss	803 Dexter Drive	College Station
LUCA151000004	711	20	50.00	Col.	Charles L. Lucas	1510 North Terrell	Cuero
LUTH262100002	711	20	100.00	Mr.	John Luther, Jr.	P. O. Box 26219	Fort Worth
MEYE020200002	711	20	100.00	Mr.	George B. Meyer	202 Glennville Court	Houston
NORM120000004	711	20	50.00	Mr.	John V. Norman	1200 Summit Avenue	Fort Worth
SIMM034000002	711	20	200.00	Mr.	Roy H. Simmons	P.O. Box 340	Brownwood

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
[illegible]	711	20	1000.00	Mr.	Richard H. Skinner	3209 Huntingdon Place	Houston
[illegible]	711	20	100.00	Mr.	Keith Stone	4716 St. Johns Drive	Dallas
[illegible]	711	20	200.00	Mr.	[illegible]	[illegible]	[illegible]

7 7 5 7 4 7 0 4 0 6 8

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
SKIN320900001	711	20	1000.00	Mr.	Richard H. Skinner	3209 Huntingdon Place	Houston
STON471600004	711	20	100.00	Mr.	Keith Stone	4716 St. Johns Drive	Dallas
STRI092100002	711	20	200.00	Mr.	H. W. Strickland	921 5th Street	Bay City
WILL394100003	711	20	100.00	Mrs.	Murphy M. Williams	3941 Lovers Lane	Dallas
LOWD272700001	712	0	1000.00	Mr.	R. R. Lowdon	2727 West Seventh Street	Fort Worth
HERN290300001	712	1	1000.00	Mr.	H. David Herndon	2903 Tarry Trail	Austin
ARLE056800002	712	20	50.00	Mr.	Roy W.Arledge	P. O. Box 568	Stamford
BAGW200100001	712	20	100.00	Mr.	David S. Bagwell	2001 Bryan Tower	Dallas
BARK135100003	712	20	20.00	Mr.	Eli F. Barker	P. O. Box 1351	Nederland
BROW321600003	712	20	25.00	Mr.	Joe A. Brownfield	P. O. Box 3216	Waco
CARL460100001	712	20	1000.00	Mr.	Donald M. Carlton	4601 Cat Mountain Dr.	Austin
CRAW275000004	712	20	50.00	Mr.	A.S. Crawford	P.O. Box 2750	Beaumont
DIXO520100003	712	20	500.00	Mr.	Roger M. Dixon	Cotton Exchange Building	Dallas
EHRH660900014	712	20	15.00	Mrs.	Marie Ehrhardt	6609 Klein Cemetery Rd.	Spring
EICH690100002	712	20	100.00	Mr.	James K. Eichelberger,Jr.	6901 North Lamar	Austin
FLEM192000003	712	20	100.00	Mrs.	Mary H. Fleming	1920 Sunset Blvd.	Houston
GUIL041000004	712	20	250.00	Mr.	G. B. Guild	P. O. Box 410	Bertram

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
HAAS051900002	712	20	100.00	Mr.	Richard E. Haas	P. O. Box 519	Corpus Christi
HARR165900003	712	20	50.00	Mr.	Ronald Harris	16592 Bordeaux Lane	Huntington Beach
HOLC220100001	712	20	1000.00	Mr.	James C. Holcomb	2201 Teckla	Amarillo
HOPE369700002	712	20	500.00	Mr.	Alvin C. Hope,Jr	P.O. Box 3697	Abilene

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
HAAS051900002	712	20	100.00	Mr.	Richard E. Haas	P. O. Box 519	Corpus Christi
HARR165900003	712	20	50.00	Mr.	Ronald Harris	16592 Bordeaux Lane	Huntington Beach
HOLC220100001	712	20	1000.00	Mr.	James C. Holcomb	2201 Teckla	Amarillo
HOPE369700002	712	20	500.00	Mr.	Alvin C. Hope,Jr.	P.O. Box 3697	Abilene
HOWE340000003	712	20	50.00	Mr.	Mark A. Howe	3400 Norman Lane	Bedford
JOHN121100002	712	20	100.00	Mr.	Glenn H. Johnson	12118 Broken Bough	Houston
JONE007400006	712	20	20.00	Mr.	W. H. Jones	Star Route, Box 74	Fluvanna
KAMM030700002	712	20	25.00	Mr.	Herbert H. Kamm	307 South Horne	Duncanville
MART146800003	712	20	100.00	Mr.	Waylan C. Martin	P.O. Box 1468	Monahans
MASQ220400101	712	20	1000.00	Mrs.	Elizabeth Masquelette	2204 Welch	Houston
MASQ402700101	712	20	1000.00	Mrs.	Melissa Masquelette	4027 Branard	Houston
MCSP446500003	712	20	50.00	Mr.	Floyd McSpadden,Jr.	4465 Thomas Park	Beaumont
MERC551500002	712	20	100.00	Mr.	Richard C. Merchant	5515 Forest Haven Drive	Houston
SCHA668000003	712	20	200.00	Mr.	George Schaumburg	6680 Windwood Lane	Beaumont
SKEL010900002	712	20	200.00	Dr.	David b. Skelton	109 Corsicana Stret	Hillsboro
WILB251200004	712	20	100.00	Dr.	Sam W. Wilborn	2512 Hillview	Austin
YOUN205200002	712	20	100.00	Mr.	L. M. Young	P. O. Box 2052	Abilene

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
WHEE123900001	713	1	500.00	Mr.	Robert L. Wheelock, Jr.	P. O. Box 1239	Corsicana
BIED005800101	713	20	1000.00	Mrs.	Betty Biedenhorn	P. O. Box 58	

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
WHEE123900001	713	1	500.00	Mr.	Robert L. Wheelock, Jr.	P. O. Box 1239	Corsicana
BIED005800101	713	20	1000.00	Mrs.	Betty Biedenharn	P. O. Box 58	San Antonio
BLAK360100003	713	20	100.00	Mr.	Thomas W. Blake	3601 Allen Parkway	Houston
BLAN021500002	713	20	100.00	Mr.	Ira Y. Blanton	P.O. Box 215	Marfa
DUGG120500002	713	20	100.00	Mr.	Lee Duggan	1205 Horseshoe Drive	Sugar Land
HERD420200001	713	20	1000.00	Mr.	Paul K. Herder	4202 Hwy. 90 East	San Antonio
LEHR007200002	713	20	500.00	Mr.	William N. Lehrer	P. O. Box 72	Garwood
LOGU130000101	713	20	1000.00	Mrs.	Beth Logue	1300 One Energy Square	Dallas
MCKN100000003	713	20	100.00	Mr.	Thomas L. McKnight	1000 Singing Hills	El Paso
MUIR015700002	713	20	200.00	Mrs.	Robert J. Muir	Route 1, Box 57	Aledo
SHIE056800003	713	20	100.00	Mr.	William E. Shields, Jr.	P. O. Box 568	Azle
TACK053600004	713	20	35.00	Mr.	Edward J. Tackett	P. O. Box 536	Albany
WALC200300002	713	20	250.00	Mr.	Jack Walcher	2003 Shell	Midland
WALL321200002	713	20	100.00	Mr.	C. I. Wall	3212 Austin Street	Amarillo
SMIT142700003	716	2	500.00	Mr.	Roy J. Smith	P. O. Box 1427	Killeen
ANDE011700002	716	20	50.00	Mrs.	Gloria Anderson	117 West Sycamore	Denton
ATKI078800002	716	20	250.00	Mr.	B. E. Atkinson	P.O. Drawer 788	Lufkin

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
BARN050400002	716	20	20.00	Ms.	Katherine D. Barnett	6504 22nd Avenue North	Texas City

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
BARN050400002	716	20	20.00	Ms.	Katherine O. Barnett	504-22nd Avenue North	Texas City
BEYE100000005	716	20	40.00	Mrs.	Bernice W. Beyers	10008 Meadowbrook Drive	Dallas
BROW004500002	716	20	500.00	Mrs.	Margaret L. Brown	45 Christopher Street	New York
CAME286800002	716	20	500.00	Mr.	William D. Cameron	2868 Dominique	Galveston
CARR030900002	716	20	5.00	Mrs.	Blanche Carrigan	309 N. Twelfth Street	Junction
COBB260000002	716	20	200.00	Mr.	Joe Cobb	2600 Clark Lane	Paris
CRAW060600002	716	20	100.00	Mr.	Clyde C. Crawford	P.O. Box 606	Gladewater
FUOS022000002	716	20	250.00	Mr.	Alton C. Fuos	220 Halbart Crescent	San Antonio
GONZ340900002	716	20	100.00	Mrs.	Eugenie Gonzalez	3409 Monte Vista	Austin
GRAV565800102	716	20	100.00	Dr.	Ghent Graves,Sr.	5658 Cedar Creek	Houston
LAMB190900001	716	20	100.00	Mr.	Ken Lambert	1909 Midcrest	Plano
LEDG010400002	716	20	500.00	Mr.	Lovett Ledger	104 East Avenue D	Copperas Cove
MARS120800003	716	20	500.00	Mrs.	J.A. Marshall	Route 1, Box 208	Marquez
MATT181100005	716	20	100.00	Dr.	Russell A. Matthes	1811 Merlin	Bay City
MAYF040600003	716	20	200.00	Mr.	Perry Mayfield	406 W. Austin	Round Rock
NICO034300004	716	20	75.00	Mr.	Anthony L. Nicolais	343 Wycliffe Drive	Houston
PRAS096900003	716	20	100.00	Mr.	Joe A. Prasifka	969 Terminal Street	Dallas

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
TEMP352800003	716	20	100.00	Mr.	Ralph R. Temple, Jr.	3528 Winifred Drive	Fort Worth
WHIT115000002	716	20	100.00	Mr.	J. R. Whitney	P. O. Box 1150	

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
TEMP352800003	716	20	100.00	Mr.	Ralph R. Temple,Jr.	3528 Winifred Drive	Fort Worth
WHIT115000002	716	20	100.00	Mr.	L. R. Whitney	P. O. Box 1150	Killeen
WILE013600002	716	20	200.00	Mr.	Stephen G. Wiles	136 Carters Grove	Conroe
WILK382100003	716	20	100.00	Mr.	George E. Wilkin,Jr.	3821 Gillon	Dallas
WILL786400002	716	20	500.00	Mr.	Claude S. Williams	Click Route	Llano
YATE131300003	716	20	100.00	Mr.	Ray Yates	1313 Richcreek Road	Austin
PAC 148000001	716	30	2000.00	The	American Family PAC	Box 1480	Columbus
ZACH760300001	717	2	1000.00	Mrs.	H. B. Zachry, Jr.	7603 Shadylane	San Antonio
BROW021300101	717	5	1000.00	Mrs.	Lenora Brown	213 Sir Arthur Court	San Antonio
DELM070000001	717	5	1000.00	Mr.	Merle W. Delmer	700 Olmos Drive, E	San Antonio
DENM053500001	717	5	1000.00	Mr.	Gilbert M. Denman, Jr.	535 San Antonio Bank &	San Antonio
ELLI686700003	717	5	500.00	Mr.	Donald S. Elliott	P. O. Box 6867	San Antonio
HALF335500001	717	5	1000.00	Mr.	Hugh Halff, Jr.	3355 Cherry Ridge Road	San Antonio
HASS012900002	717	5	500.00	Mr.	James C. Hasslocher	129 Haskin Road	San Antonio
ROSE071100001	717	5	1000.00	Mr.	Stanley D. Rosenberg	711 Navarro, Suite 620	San Antonio
SCHN013300005	717	5	500.00	Mr.	O. P. Schnabel	133 Hermosa Drive East	San Antonio
SEEL160400001	717	5	1000.00	Mr.	Arthur Seeligson, III	1604 NBC Building	San Antonio

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
SELI091100001	717	5	1000.00	Mr.	Marvin Selig	P. O. Box 911	Seguin
SMIT072200004	717	5	200.00	Dr.	J. Marvin Smith, III	722 Patterson Avenue	

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
SELI091100001	717	5	1000.00	Mr.	Marvin Selig	P. O. Box 911	Seguin
SMIT072200004	717	5	200.00	Dr.	J. Marvin Smith, III	722 Patterson Avenue	San Antonio
SPIL770900003	717	5	800.00	Mr.	Robert S. Spiller	7709 Broadway, No. 306	San Antonio
WEST870000002	717	5	1000.00	Dr.	Robert V. West, Jr.	8700 Tesoro Drive	San Antonio
WHIT163000001	717	5	1000.00	Mr.	John H. White	P. O. Box 16309	San Antonio
BARR000100004	717	20	200.00	Mr.	O. J. Barron	Route 1	Spur
BENA074300002	717	20	100.00	Mr.	M.G. Benavides	P.O. Box 743	Laredo
BOON567600002	717	20	100.00	Mr.	Dan Boone	Route 5, Box 676	Burleson
CROF073500002	717	20	25.00	Ms.	Helen H. Croft	Box 735	Proctor
DAVI049400005	717	20	50.00	Mr.	James A. Davidson	Box 494	Midland
EMMO232100002	717	20	100.00	Mr.	Patrick M. Emmons	2321 King Richard	Grand Prairie
FERR024700002	717	20	100.00	Mr.	J.H. Ferrel	P.O. Box 247	Jacksboro
JORN680400002	717	20	25.00	Mr.	James M. Jorns	6804 Loma Vista Dr.	Ft. Worth
MONC610201003	717	20	200.00	Hon.	Mike Moncrief	Fort Worth Club Tower	Fort Worth
NOWA033000003	717	20	100.00	Mr.	Richard A. Nowak	330 Oakview	Lewisville
TEAG161700003	717	20	50.00	Mr.	Mack H. Teague	1617 Alexander Drive	Waxahachie
URAN021400001	717	23	1000.00	Mr.	C. V. Uranga	214 N. E. Loop 410	San Antonio

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PAC 040300001	717	30	1000.00	The	Texas Shrimp Association	National PAC	Austin
PAC 180001001	717	30	2000.00	The	Contel PAC	1000 F Street, N.W.	

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PAC 040300001	717	30	1000.00	The	Texas Shrimp Association	National PAC	Austin
PAC 180001001	717	30	2000.00	The	Contel PAC	1800 K Street, N.W.	Washington
PAC 424000001	717	30	1000.00	The	Zapata PAC	P. O. Box 4240	Houston
CON0593400004	718	20	25.00	Mr.	David Z. Conoly	5934 South Staples, Suite 20	Corpus Christi
FRAN080401002	718	20	100.00	Mrs.	Camille F. Franklin	80[illegible] Tucker Street	McKinney
HAGG611300101	718	20	1000.00	Mrs.	Isabell Haggar	6113 Lemmon Avenue	Dallas
HILL010700002	718	20	250.00	Mr.	B. F. Hill	P. O. Box 107	Fairfield
LAND020600002	718	20	100.00	Mrs.	W.D. Landers	P.O. Box 206	Granbury
SWEA100100004	718	20	100.00	Mr.	Fred C. Sweat	10011 Bayou Glen	Houston
BARR000100005	719	6	200.00	Mr.	O. J. Barron	Route 1	Spur
MILA149900001	720	9	100.00	Mr.	Tom S. Milam	Box 1499	Lubbock
CARY251900002	723	1	500.00	Mr.	Arthur Cary	2519 Farrington	Dallas
KRED136500001	723	2	250.00	Mr.	Louis W. Kreditor	1365 Regal Row	Dallas
ARNO656600004	723	7	100.00	Mr.	James W. Arnold	P. O. Box 6566	Tyler
BROO141100001	723	7	100.00	Mr.	B. G. Brookshire	P. O. Box 1411	Tyler
FAIR068900003	723	7	100.00	Mr.	Wilton H. Fair	P. O. Box 689	Tyler
ZEPP065700003	723	7	100.00	Mr.	Keating V. Zeppa	P. O. Box 657	Tyler

DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
[illegible]		[illegible]	Mr.	[illegible] Gonzales,Jr.	6830 Huffsmith Road	Tomball

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
GONZ883000003	723	20	100.00	Mr.	Refugio Gonzales,Jr.	8830 Huffsmith Road	Tomball
HUEB203500002	724	2	25.00	Mrs.	Edith Huebner	P.O. Drawer 20350	San Antonio
RAY 068900003	724	4	500.00	Mr.	Richard L. Ray	P. O. Box 689	Tyler
WYNN041900001	724	4	1000.00	Mr.	James C. Wynne, Jr.	P. O. Box 419	Tyler
THOM010600002	724	5	500.00	Dr.	Sellers J. Thomas, Jr.	106 Maple Valley	Houston
ANDE053900002	725	0	100.00	Dr.	William L. Anderson	P.O. Box 539	Addison
CRAI251100001	725	2	500.00	Dr.	William H. Crain	2511 San Gabriel	Austin
MADD050000101	725	8	1000.00	Gen.	Sam Maddux, Jr.	500 Alameda Circle	San Antonio
PAC 015000003	725	30	2500.00	The	National Federation of	Independent Business	San Mateo
PAC 040500001	725	30	2500.00	The	Committee for Good Govt	Temple-Eastex Incorp.	Diboll
LADD470500101	726	3	900.00	Mrs.	Peggy Ladd	4705 Olsen	Amarillo
GLOV028700001	727	4	100.00	Mr.	Frank Glover	P.O Box 287	Mt. Pleasant
YOST067800001	727	4	100.00	Mr.	N. M. Yost	P.O. Box 678	Gainesville
MART180400002	730	1	1000.00	Mr.	William H. Martin	1804 1st Natl. Bank Bldg.	Midland
BROW321600004	730	4	25.00	Mr.	Joe A. Brownfield	P. O. Box 3216	Waco
FROS180200002	730	7	500.00	Mrs.	Jack Frost	1802 NBC Building	San Antonio
HUFF497600002	730	7	500.00	Mr.	Bill Huffman	P. O. Box 4976	Odessa

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PICK392600101	730	20	1000.00	Ms.	Paige Pickens	3926 Potomac Street	Dallas

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PICK392600101	730	20	1000.00	Ms.	Paige Pickens	3926 Potomac Street	Dallas
PICK392600201	730	20	1000.00	Ms.	Allison Pickens	3926 Potomac	Dallas
PAC 200000001	731	8	5000.00	The	Nat'l. Home Builders-PAC	15th and M Streets Nw.	Washington
ROAC187100001	801	5	200.00	Mr.	T. L. Roach, Jr.	P. O. Box 1871	Amarillo
LADD470500001	801	6	200.00	Mr.	Frank A. Ladd	4705 Olsen	Amarillo
MCKE116900001	802	14	1000.00	Mr.	Montana McKean	P. O. Box 1169	Seguin
HARR572600002	803	20	100.00	Mr.	James G. Harris	5726 Bayou Glen	Houston
NORT060600002	803	20	100.00	Mr.	Sherman H. Norton,Jr.	606 Republic Bank Bldg.	Lubbock
CARL070300001	806	11	1000.00	Dr.	Kenneth Q. Carlile	703 Bergstrom Place	Marshall
CORT021800001	806	11	1000.00	Mr.	David Cortez	218 Produce Row	San Antonio
ROBB140400001	806	13	1000.00	Ms.	Janna L. Robbins	1404 Le Duke Blvd.	Longview
BROW321600005	807	17	200.00	Mr.	Joe A. Brownfield	P. O. Box 3216	Waco
PATT026800001	807	17	1000.00	Mr.	Mike Patton	268 Geneseo	San Antonio
SCHU340200001	807	17	500.00	Mr.	R. J. Schumacher	3402 Tx. American Bk. Bldg.	Ft. Worth
ALLE320700001	809	20	1000.00	Mrs.	Helen Allen	3207 Groveland Lane	Houston
MART140400001	809	20	1000.00	Mrs.	Karen Martin	1404 Country Club Drive	Midland
PAC 112000001	810	20	5000.00	The	Union Pacific Fund	1120 20th St. N.W.	Washington

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
HOFF580000001	815	1	1000.00	Mr.	Henry Hoffman	5800 Campus Circle Drive	Irving
BROW321600004	815	7	100.00	Mr.	Joe A. Brownfield	P. O. Box 3216	...

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
HOFF580000001	815	1	1000.00	Mr.	Henry Hoffman	5800 Campus Circle Drive	Irving
BROW321600006	815	7	100.00	Mr.	Joe A. Brownfield	P. O. Box 3216	Waco
RIED480100001	815	20	1000.00	Mr.	John A. Riedinger	4801 - 18th Street	Lubbock
SELT402500001	815	20	1000.00	Mr.	S. S. Seltzer, Jr.	4025 Ocean Drive	Corpus Christi
BROW321600007	816	4	25.00	Mr.	Joe A. Brownfield	P. O. Box 3216	Waco
SHEL360900001	817	5	500.00	Mr.	J. T. Shelton	3609 Pioneer Parkway	Arlington
BONN126400001	817	9	500.00	Mr.	Z. D. Bonner	12645 Old Wick Road	San Antonio
EMDE950700001	817	20	1000.00	Mr.	William O. Emde	9507 Harwin Dr.	Houston
EMDE950700101	817	20	1000.00	Mrs.	Sally Emde	9507 Harwin Dr.	Houston
MCEV630100001	820	5	1000.00	Mr.	A. P. McEvoy	6301 Preston Parkway	Dallas
NOWL051000001	820	5	1000.00	Mrs.	Bettye Nowlin	510 Hazelwood	Ft. Worth
NOWL295000002	820	5	500.00	Mr.	Wade T. Nowlin	P. O. Box 2950	Ft. Worth
VALE660400002	820	5	500.00	Mrs.	Rose Valentinitsch	6604 Greenbriar	Houston
THOM191700001	820	6	100.00	Mr.	Wayne Thomas	P. O. Box 1917	Hereford
PETT010100003	821	4	100.00	Mr.	O. S. Petty	101 E. Kings Highway	San Antonio
BRAN184000001	823	1	1000.00	Mr.	O. E. Brand	P. O. Box 1840	McAllen
BURF140000001	823	1	1000.00	Mr.	William E. Burford	1400 Main Street	Dallas

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
RUNN364900001	1016	5	1000.00	Mr.	Clive Runnells	3649 Chevy Chase	Houston

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
HARG630000003	823	1	200.00	Mr.	J. W. Hargrove	6300 Texas Commerce Tower	Houston
HOBB159000002	823	1	200.00	Mr.	H. Wendell Hobbs	Route 1, Box 590	McAllen
ROGE107700001	823	1	200.00	Mr.	David O. Rogers	P. O. Box 1077	Edinburg
RONE331600001	823	1	1000.00	Mr.	G. E. Roney	3316 Kent Lane	McAllen
STEM270000001	823	1	1000.00	Mr.	John M. Stemmons, Jr.	2700 Stemmons Freeway	Dallas
PAC 022400001	823	20	2000.00	The	Sante Fe Southern Pacific	Co. PAC	Chicago
CRAI251100002	827	1	500.00	Dr.	William H. Crain	2511 San Gabriel	Austin
CALD090400101	830	9	1000.00	Ms.	Marilyn Caldwell	904 E. Spring Valley	Richardson
FAY 051500101	830	9	1000.00	Mr.	Albert B. Fay, Jr.	515 Houston Avenue	Houston
RAMS351000001	831	1	25.00	Ms.	Laurie Ramsey	3510 Cranbrook	Wichita Falls
FISC246400001	904	1	1000.00	Mr.	Jerry E. Fischer	P. O. Box 2464	Corpus Christi
KEEL753500001	904	1	1000.00	Mr.	Thomas T. Keeler	P. O. Box 7535	Corpus Christi
KUNI105300101	904	1	1000.00	Mrs.	Joan Kunitz	P. O. Box 1053	Sinton
PAC 085500001	904	10	5000.00	The	Texas Repub. Cong. Comm.	P. O. Box 855	Austin
ROGE131000201	905	12	500.00	Dr.	S. J. Rogers	P. O. Box 1310	Beaumont
ALLE390200002	906	20	50.00	Mr.	C.J. Allen	P.O. Box 3902	Bryan
PENT694500101	906	20	500.00	Mrs.	Mary Jo Pentecost	Sanco Route	Robert Lee

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
ALLE390200003	907	20	50.00	Mr.	C.J. Allen	P.O. Box 3902	Bryan

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
ALLE390200003	907	20	50.00	Mr.	C.J. Allen	P.O. Box 3902	Bryan
PENT694500102	907	20	500.00	Mrs.	Mary Jo Pentecost	Sanco Route	Robert Lee
OVER110100001	910	1	1000.00	Mr.	Gene E. Overbeck	1101 - 17th Street, N. W.	Washington
MCEL116700001	912	20	1000.00	Hon.	Eugene M. McElyea	P. O. Box 1167	Crockett
MCEL116700101	912	20	1000.00	Mrs.	Carolyn McElyea	P. O. Box 1167	Crockett
SIMM018600002	917	3	25.00	Mrs.	Mildred W. Simmons	P.O. Box 186	Imperial
TRIE626300001	917	8	500.00	Mr.	Harry L. Triece	6263 Harry Hines Blvd.	Dallas
AHLS423600001	918	10	1000.00	Mr.	Walter Ahlschlager	4236 Armstrong Parkway	Dallas
TRIM802000001	919	9	1000.00	Mr.	Robert L. Trimble	P. O. Box 8020087	Dallas
PARK010700003	920	9	100.00	Mr.	Daniel T. Parker	P. O. Box 107	Houston
PENT694500001	920	10	500.00	Mr.	N. C. Pentecost	Sanco Route	Robert Lee
CUST370300001	920	14	1000.00	Mr.	W. Allen Custard	3703 Crescent Ave.	Dallas
SIMM018600003	921	5	25.00	Mrs.	Mildred W. Simmons	P.O. Box 186	Imperial
MOTL880100002	921	9	15.00	Mrs.	Becky Motley	3801 Fleetwood	Amarillo
SCHI100100101	921	9	1000.00	Mrs.	Pat Schiff	5307 East Mockingbird Lane	Dallas
HOBB159000003	921	10	300.00	Mr.	H. Wendell Hobbs	Route 1, Box 590	McAllen
FREE752400001	924	0	1000.00	Mr.	Jerry W. Freeman	7524 Glen Albens	Dallas

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
RUNN364900001	1016	5	1000.00	Mr.	[illegible]	3649 Chevy Chase	Houston

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
SCHI530700001	924	9	1000.00	Mr.	Herbert Schiff	5307 East Mockingbird Lane,	Dallas
AGLE011400001	924	20	1000.00	Mr.	Randolph J. Agley	114 Lothrop	Grosspointe Farms
ALKE301100101	924	20	1000.00	Mrs.	Margaret Alkek	3011 N. Main	Victoria
ARTH171100001	924	20	1000.00	Mr.	Roland Arthur	1711 North Beltline Road	Irving
ARTH171100101	924	20	1000.00	Mrs.	Roland Arthur	1711 North Beltline Road	Irving
BRIN212300001	924	20	1000.00	Mr.	L. D. Brinkman	2123 Sidney Baker Street	Kerrville
BRIN212300101	924	20	1000.00	Mrs.	L. D. Brinkman	2123 Sidney Baker Street	Kerrville
CASS272700001	924	20	1000.00	Mr.	Michael L. Cass	2727 Routh Street	Dallas
CASS272700101	924	20	1000.00	Mr.	William G. Cass	2727 Routh Street	Dallas
COFF620100001	924	20	1000.00	Mr.	Roy C. Coffee	6201 Hillcrest	Dallas
DAWL200000001	924	20	1000.00	Mr.	James R. Dawley	2000 Bering Dr.	Houston
EDWA243100001	924	20	1000.00	Ms.	Karen Edwards	P. O. Box 2431	Big Spring
HAMM676900001	924	20	1000.00	Mr.	Willard H. Hammonds	P. O. Box 6769	Corpus Christi
HART590500001	924	20	1000.00	Mr.	Thomas E. Hartin	5905 Club Oaks Drive	Dallas
HUIE144000002	924	20	1000.00	Mr.	Harvey Huie	14400 Dallas Parkway	Dallas
HUTC594900001	924	20	1000.00	Mr.	Michael D. Hutchison	5949 Sherry Lane, Suite 700	Dallas
KELL211400002	924	20	750.00	Mr.	James E. Kellum	2114 Sunnyvale	Grand Prairie

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
KELL211400101	924	20	1000.00	Mrs.	[illegible]	2114 Sunnyvale	Grand Prairie

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
KELL211400101	924	20	1000.00	Mrs.	Ella M. Kellum	2114 Sunnyvale	Grand Prairie
KERC010000001	924	20	1000.00	Mr.	Joe B. Kercheville	100 NBC Building	San Antonio
KNIV150600001	924	20	500.00	Mrs.	Jessie V. Kniveton	1506 S. Ike	Monahans
LACY321000101	924	20	1000.00	Mr.	William David Lacy	3210 Wooded Aires	Waco
LUMM141300001	924	20	1000.00	Mr.	A. Don Lummus	1413 Amazon	Plano
MCNE292800001	924	20	1000.00	Mr.	L. A. McNeil	P. O. Box 2928	Corpus Christi
MILL200100001	924	20	1000.00	Mr.	Vance C. Miller	2001 Bryan Tower, 30th Floor	Dallas
MILL200100101	924	20	1000.00	Mrs.	Geraldine Miller	2001 Bryan Tower, 30th Floor	Dallas
MISC747900001	924	20	1000.00	Mr.	Walter M. Mischer	P.O. Box 7479	Houston
PAC 112001001	924	20	5000.00	The	American Bankers Assoc. PAC	1120 Connecticut Ave., N.W.	Washington
PRIC370900001	924	20	1000.00	Mr.	J. Paul Price	3709 Wentwood	Dallas
REA 530500001	924	20	1000.00	Mr.	Edward Rea	5305 Mariners Drive	Plano
REA 530500101	924	20	1000.00	Mrs.	Elga Rea	5305 Mariners Drive	Plano
SAUE470000001	924	20	1000.00	Mr.	John Sauer	P. O. Box 470063	Dallas
SOWE481100001	924	20	1000.00	Mrs.	Cathy Sowers	4811 - 32nd Street	Dickinson
STAR021900001	924	20	1000.00	Mr.	E. Trine Starnes	219 Heritage Oaks	Houston
STIE030800001	924	20	1000.00	Mrs.	Merle P. Stieler	P. O. Box 308	Comfort

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
RUNN364900001	1016	5	1000.00	Mr.	Clive Runnells	3649 Chevy Chase	Houston
RUNN364900101	1016	5	1000.00	Mrs.	Nancy M. Runnells	3649 Chevy Chase	

9 8 5 3 4 0 7 4 0 6 8

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
UPHA094000101	924	20	1000.00	Mrs.	Chester R. Upham, Jr.	P. O. Box 940	Mineral Wells
WEST122000001	924	20	1000.00	Mrs.	Esther Westby-Aus	1220 N. E. 17th, Apt. 6A	Portland
WIND156200001	924	20	1000.00	Dr.	Robert E. Windom	1562 South Drive	Sarasota
WIND156200101	924	20	1000.00	Mrs.	Lellia Windom	1562 South Drive	Sarasota
ACER123400101	924	21	1000.00	Mrs.	Ebby Halliday Acers	5999 W. Northwest Highway	Dallas
ARTH171100201	924	21	1000.00	Mr.	Alvis Arthur	1711 N. Beltline Road	Irving
BANK474700101	924	21	1000.00	Mrs.	Helen Bankston	4747 LBJ Freeway	Dallas
BUSH176300001	924	21	1000.00	Mr.	George W. Bush	17630 Davenport Road	Dallas
CALD120000001	924	21	1000.00	Mr.	Bruce Calder	1200 Hartford Building	Dallas
CALD126500001	924	21	1000.00	Mrs.	Elloine M. Calder	1265 Hartford Building	Dallas
CASS272700201	924	21	1000.00	Mrs.	Mary Cass	2727 Routh Street	Dallas
CASS272700301	924	21	1000.00	Mr.	Frank Cass	2727 Routh Street	Dallas
CLAR000101001	924	21	1000.00	Mr.	Jason W. Clark	RFD 1	Windsor
CROW102600102	924	21	500.00	Mr.	David Crowley	10265 Inwood Road	Dallas
DANI013000001	924	21	1000.00	Mr.	Joel W. Daniel	P. O. Box 130	Llano
DIXO506500001	924	21	1000.00	Mr.	John W. Dixon	5065 Lakehill Court	Dallas
FOLS164700001	924	21	1000.00	Mr.	Robert S. Folsom	16475 Dallas Parkway	Dallas

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
HAAS164200001	924	21	1000.00	Mr.	Marvin D. Haass	P. O. Box 16429	San Antonio

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
HAAS164200001	924	21	1000.00	Mr.	Marvin D. Haass	P. O. Box 16429	San Antonio
HOBB159000101	924	21	1000.00	Mrs.	H. Wendell Hobbs	Route 1, Box 590	McAllen
KLEI062000001	924	21	1000.00	Ms.	G. Kimberly Klein	620 S. Taylor	Amarillo
KLEI170200001	924	21	1000.00	Mrs.	Frances W. Klein	1702 N. Julian	Amarillo
MAYB001000001	924	21	1000.00	Mr.	Frank W. Mayborn	10 South 3rd Street	Temple
MAYB001000101	924	21	1000.00	Mrs.	Frank W. Mayborn	10 South 3rd	Temple
MCAN062000001	924	21	1000.00	Ms.	Catharine W. McAnally	620 S. Taylor	Amarillo
OATE692400001	924	21	1000.00	Mrs.	Carl E. Oates	6924 Stefani	Dallas
OATE692400101	924	21	1000.00	Mr.	Carl E. Oates	6924 Stefani	Dallas
STEM270000101	924	21	1000.00	Mr.	John M. Stemmons	2700 Stemmons Freeway	Dallas
TACK541000003	924	21	500.00	Mr.	David R. Tacke	5410 Royal Crest	Dallas
TACK541000101	924	21	500.00	Mrs.	David R. Tacke	5410 Royal Crest	Dallas
TAPP060200101	924	21	1000.00	Mrs.	Theresa Tapp	602 Slaton Road	Lubbock
SINK630700001	925	19	276.99	Mr.	Richard T. Sink	P.O. Box BWH	Wichita Falls
SINK630700002	926	0	491.40	Mr.	Richard T. Sink	P.O. Box BWH	Wichita Falls
DOOR069600002	926	11	200.00	Mr.	Richard Doornbos	P. O. Box 696	Nederland
LEHM319500001	926	11	350.00	Dr.	Jerry S. Lehmann	3195 Medical Center Dr.	Beaumont

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
RUNN364900001	1016	5	1000.00	Mr.	Clive Runnells	3649 Chevy Chase	Houston
RUNN364900101	1016	5	1000.00	Mrs.	Nancy M. Runnells	[illegible]y Chase	

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
BOLI051000001	927	1	500.00	Mr.	D. Phil Bolin	510 Hamilton Building	Wichita Falls
GARD621700001	927	2	1000.00	Mr.	Joe Gardner	Box 6217	Corpus Christi
NIEN732000001	1001	1	500.00	Mr.	Frank S. Niendorff	7320 Mopac North, Suite 101	Austin
HUEB203500003	1001	7	50.00	Mrs.	Edith Huebner	P.O. Drawer 20350	San Antonio
JACK388000001	1001	10	100.00	Mr.	J. T. Jackson	3880 Hulen Street, Suite 329	Fort Worth
NEUH190000002	1001	17	125.00	Mr.	J. V. Neuhaus, III	1900 West Loop South	Houston
ROGE107700101	1001	21	500.00	Mrs.	Anita Rogers	P. O. Box 1077	Edinburg
ANON840400001	1002	2	20.00		Anonymous Donors		
SIMM018600004	1002	11	500.00	Mrs.	Mildred W. Simmons	P.O. Box 186	Imperial
TEEP400200002	1002	13	500.00	Mrs.	Mary Teeple	4002 Balcones Drive	Austin
BARR000100102	1002	14	1000.00	Mrs.	Eleonora Barron	Route 1	Spur
STOR190100005	1002	14	200.00	Mrs.	John W. Stormont	1901 East Warren	Victoria
FUNK515100002	1003	2	200.00	Mr.	John K. Funk	Prestonwood Tower, Suite 333	Dallas
HUNT140101001	1003	7	1000.00	Mr.	Ray L. Hunt	1401 InterFirst One	Dallas
HUNT140101101	1003	7	1000.00	Mrs.	Nancy A. Hunt	1401 InterFirst One	Dallas
HUNT140102001	1003	7	1000.00	Mrs.	H. L. Hunt	1401 InterFirst One	Dallas
BELL003600001	1003	8	100.00	Mr.	Conly Bell	P. O. Box 36	La Villa

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PAC 230800002	1003	8	500.00	The	Varmicon Industries PAC	P. O. Box 2308	Harlingen
ALLG022600101	1003	9	50.00	Ms.	Jo Allgood	226 E. Illinois St.	

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PAC 230800002	1003	8	500.00	The	Varmicon Industries PAC	P. O. Box 2308	Harlingen
ALLG022600101	1003	9	50.00	Ms.	Jo Allgood	226 E. Illinois St.	New Port Richey
NUTT011200001	1003	9	250.00	Mr.	R. A. Nutter	112 Broken Bough	Conroe
BRUN632600002	1003	10	100.00	Mr.	Robert J. Bruni	6326 Sovereign Drive	San Antonio
CLAG020500002	1003	12	25.00	Mr.	William Clague	205 South Shipp	Madisonville
BOTT120000002	1003	13	500.00	Mr.	E.B. Bottom	1200 Elm	Mission
BOTT120000101	1003	13	1000.00	Mrs.	Adelle Bottom	1200 Elm	Mission
CONN302000001	1003	13	1000.00	Mrs.	Michelle K. Connor	3020 Duke	Houston
CONN302000101	1003	13	1000.00	Mr.	James Lewis Connor III	3020 Duke	Houston
DAVI125000101	1003	13	1000.00	Mrs.	Nancy A. Davis	P. O. Box 12507	Ft. Worth
FUND079400001	1003	13	1000.00	The	Tower Senate Club	P. O. Box 794	Austin
PAC 284600003	1003	13	1000.00	The	SEPAC	P. O. Box 2846	Houston
MATT181400002	1004	1	10.00	Mr.	Preston A. Matthews	1814 Seevers Avenue	Dallas
GORD191900001	1004	2	5.00	Mr.	James Van Gorder	1919 Commerce Bldg.	Fort Worth
MASO050200001	1004	3	50.00	Mr.	Bill Mason	C/O Western Auto	Conroe
LACY088700001	1004	4	200.00	Ms.	Roane Lacy	P. O. Box 887	Waco
HAWN010100001	1004	6	1000.00	Mr.	George S. Hawn	101 N. Shoreline	Corpus Christi

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
RUNN364900001	1016	5	1000.00	Mr.	Clive Runnells	3649 Chevy Chase	Houston

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
KATZ143800001	1004	6	500.00	Mr.	Abe M. Katz	Box 1438	Corpus Christi
SCAN839300001	1004	6	1000.00	Mr.	Frank J. Scanio, Jr.	La Rosa Ranch	Woodsboro
BELE085500001	1004	7	24.00	Ms.	Alice Belew	855 Central, Suite 8	Odessa
COPE976200001	1004	7	48.00	Mr.	Houston Copeland	52nd & Grandview	Odessa
DAVI254100001	1004	7	160.00	Mrs.	Johnnye M. Davis	2541 Palo Verde	Odessa
HOWE160100101	1004	7	40.00	Mr.	Bernie D. Howell	1601 Redbud, P. O. Box 7013	Odessa
MURR056700001	1004	7	32.00	Mr.	John L. Murrell	Box 567	Earth
NELS401700001	1004	7	25.00	Mr.	Don M. Nelson	4017 E. Everglade	Odessa
STRO290100001	1004	7	48.00	Ms.	Dorothy J. Stroud	2901 Nabor Lane	Odessa
BROW068800002	1005	1	1000.00	Mr.	Fred Brown	P.O. Box 688	Mexia
O'DO336600101	1005	2	1000.00	Mrs.	Edith Jones O'Donnell	3366 Interfirst One	Dallas
MISC272700001	1009	9	1000.00	Mr.	Walter M. Mischer, Jr.	2727 North Loop West	Houston
BENS940000001	1009	10	1000.00	Mr.	Thomas M. Benson, Jr.	9400 San Pedro	San Antonio
CONL724700001	1009	12	1000.00	Mr.	Douglas M. Conlee	Box 7247	Waco
BAKE863800001	1009	15	1000.00	Mr.	B. S. Baker	8638 LaFonte	Houston
BOX 260400003	1009	15	500.00	Dr.	R. A. Box	2604 Jarratt	Austin
FAY 700200001	1009	15	1000.00	Mr.	Ernest Bel Fay	2304 - 1st City Natl. Bank	Houston

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PAC 251100006	1009	16	4000.00	The	Tenneco Employees Good Govt.	P.O. Box 2511	Houston
WORK139600001	1009	16	50.00	Mr.	Ross Workman	1394	

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*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
PAC 251100006	1009	16	4000.00	The	Tenneco Employees Good Govt.	P.O. Box 2511	Houston
WORK139600001	1009	16	50.00	Mr.	Ross Workman	P. O. Box 1396	Houston
BUCH008900001	1010	18	1000.00	Mr.	Sam Buchanan	P. O. Box 89	Texarkana
MEYE583000001	1010	18	1000.00	Mr.	Frederick R. Meyer	5830 Averill Way	Dallas
FASK314000002	1010	21	700.00	Mrs.	Andrew Fasken	3140 Clark Lane	Paris
COUR080900001	1010	26	1000.00	Mr.	Harold D. Courson	Box 809	Perryton
PAC 251100007	1010	27	1000.00	The	Tenneco Employees Good Govt.	P.O. Box 2511	Houston
BOST752800002	1011	1	250.00	Mr.	M. N. Bostick	P. O. Box 7528	Waco
GILL059900101	1012	10	1000.00	Mr.	P. Gill	P. O. Box 599	San Antonio
BROO142803001	1015	8	1000.00	Mr.	Hogan T. Brooks	P. O. Box 1428	Conroe
GARV154300001	1015	9	50.00	Mr.	C. F. Garvin	P. O. Box 1543	Breckenridge
MAUL121900102	1015	11	500.00	Mrs.	Margaret B. Mauldin	P. O. Box 12199	San Antonio
MCLA092700101	1015	13	1000.00	Mrs.	Drayton McLane, Jr.	P. O. Box 927	Temple
SPEA470200002	1015	14	100.00	Mr.	Harrel Spears	4702 22nd Street	Lubbock
PAC 627600001	1015	15	5000.00	The	LENPAC	P. O. Box 6276	Metairie
GONZ883000004	1015	30	600.00	Mr.	Refugio Gonzales,Jr.	8830 Huffsmith Road	Tomball
GONZ883000101	1015	30	1000.00	Mrs.	Santa S. Gonzales	8830 Huffsmith	Tomball

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
RUNN364900001	1016	5	1000.00	Mr.	Clive Runnells	3649 Chevy Chase	Houston
[illegible]	[illegible]	5	1000.00	Mrs.	Nancy M. Runnells	[illegible] Chase	

2 6 5 3 4 7 0 4 0 6 8

*KEY	DATE	BATCH#	CHECK AMT	TITLE	NAME	ADDR1	CITY
RUNN364900001	1016	5	1000.00	Mr.	Clive Runnells	3649 Chevy Chase	Houston
RUNN364900101	1016	5	1000.00	Mrs.	Nancy M. Runnells	3649 Chevy Chase	Houston
ALLE171300101	1016	7	1000.00	Mrs.	Jack M. Allen	1713 South Eton	Perryton
CARG131100001	1017	16	25.00	Mr.	Leonard R. Cargill, Jr.	13110 Appletree	Houston
SMIT700200001	1017	16	1000.00	Mr.	William A. Smith	707 Houston Club Bldg.	Houston
SWAN713600001	1017	17	1000.00	Mr.	Gerock H. Swanson	7136 S. Yale	Tulsa

384118.59 *

499 RECORDS PROCESSED

[redacted]

- EXHIBIT C

FRIENDS OF PHIL GRAMM

DETAIL OF PRIMARY EXPENSES
5-06-84 through 10-17-84

PAID EXPENSES FOR	
May 1984 (Exh. C-1)	121,291.36
June 1984 (Exh. C-2)	185,917.27
July and August 1984 (Exh. C-3)	182,519.20
Sept. and Oct. 1984 (Exh. C-4)	81,570.28
	571,298.11
UNPAID EXPENSES (Exh. C-5)	58,924.55
TOTAL PAID AND UNPAID PRIMARY EXPENSES 5-06-84 thru 10-17-84	630,222.66

SEE CHECK COPIES AND INVOICE COPIES ATTACHED.

Ex. C

8 9 0 4 0 7 4 3 5 9 4

EXHIBIT C-1

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778..
88-231/1131

12 01569

DATE May 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 113.94
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $113 and 94 cts

TO THE ORDER OF

Aries Office Products
16775 Addison Road, Suite 615
Dallas, TX 75243

COPY
NOT NEGOTIABLE

⑈001 ... ⑆113102316⑈ ... 27001

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	5261 5270	Typewriter rental - San Antonio HQ	67080			113.94 - 56.97 G 56.97 F

DEBORAH MELLODY
ENTERED
MAY 22 1984

ATTACHED CHECK IS PAYMENT OF THE ITEM LISTED ABOVE.

ALOHA FORM 91-873-2T

89040743593

Ex C-1

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS INC
P.O. Drawer 913
BRYAN, TEXAS 77...
BB 231/1131

No. 01570

DATE May ... 1984
PREVIOUS BALANCE
THIS AMOUNT CHECK
NEW BALANCE
DEPOSIT

PAY REGISTERED $25288 and 62 cts

TO THE ORDER OF

F/A Consulting Corporation
Freedom House
202 E Street, NE
Washington, DC 20002

1750

COPY
NOT NEGOTIABLE

⑈001570⑈ ⑆113102318⑆ 001...⑈01

8 9 0 4 0 7 4 3 5 9 6

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse expenses as follows:					25,2[illegible]
		Telephone Banks	4,900.00	73320			
		April Staffing	7,400.00	73330			
		Lodging	624.47	57360			
		Airfare	1,327.00	57310			
		Rent Car	30.16	57330			
		Shipping	579.90	57384			
		Postage	100.00	79007			
		Mail Shop	72.02	79005			
		Telephone	195.07	57380			
		Dallas Dinner	15,000.00	(Diners club) 73303			

DEBORAH MEL...
ENTE...

MAY 2 2 1984

4 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 915
BRYAN, TEXAS 77801
BB 231/1131

P 01571

DATE May 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 101.45
NEW BALANCE
DEPOSIT

PAY REGISTERED RB-19124 $101 and 45 cts

TO THE ORDER OF

1590

Maple Supply
5353 Maple, Suite 100
Dallas, TX 75235

COPY
NOT NEGOTIABLE

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Dallas HQ - Office Supplies	63050			101.45

DEBORA... ENT...

MAY ... 84

ATTACHED CHECK IS IN PAYMENT OF THE ITEM LISTED ABOVE.

ALOHA FORM 91-873-2T

8904074 3597

FRIENDS OF PHIL GRAMM
WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77...
58-231/1131

No 01572

DATE May 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK .50
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $96 and 50 cts

TO THE ORDER OF

Maple Supply
5353 Maple, Suite 100
Dallas, TX 75235

1590

COPY
NOT NEGOTIABLE

⑈0015 2⑈ ⑆113102315⑈ ⑈0 ...

8904074358

SUBMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Grad O'Leary office supplies	73340			95.50

MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF THE GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88-231/1131

No 01573

DATE May 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 670.49
NEW BALANCE
DEPOSIT

PAY REGISTERED 670 and 49 cts

TO THE ORDER OF

S/W Bell Tele. Co.
PO Box 90
San Antonio, TX 78287

1914

COPY
NOT NEGOTIABLE

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		512/458-2241 - Austin HQ				670.49
		Service 84.34 61059				
		Long Distance 586.15 61041				

ENTERED

2 1984

Southwestern Bell Telephone

APR 25 84 **BILL SUMMARY** /578-59B/ 512 458 2241

DATE BILL MAILED MAY 02 - CURRENT CHARGES DUE BY MAY 18 560.76
LAST BILL 560.76CR
PAYMENTS

	ADJUSTMENTS	CURRENT CHARGES	
SOUTHWESTERN BELL	.00	84.34	
AT&T COMMUNICATIONS	.00	586.15	670.49
** SUB-TOTALS	.00	670.49	

Austin HQ

AMOUNT DUE 670.49

99 59 5124582241 578 9999 521009 000000000 000067049 03

See Reverse THANK YOU FOR PAYING BY MAIL - IT'S A PLEASURE TO SERVE YOU!

8 9 0 4 0 7 4 3 5 9 9

...NDS OF THE GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCOMPOSITION OF TEXAS INC.
P.O. Drawer 913
BRYAN, TEXAS 776...
58-231/1131

P 01574

DATE May 2, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1,137.65
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-13124 $1137 and 65 cts

TO THE ORDER OF

Southwestern Bell Tele. Co.
PO Box 660012
Dallas, TX 75...

1899

COPY
NOT NEGOTIABLE

⑈001574⑈ ⑆113102316⑆ ⑆...⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		214/630-1727 - Dallas R				1,137.65
		Service 213.7	63059			
		Long Distance 923.8	63057			

...HAN MELLODY
...TERED

Southwestern Bell Telephone

2 2 1984

APR 23 84 **BILL SUMMARY** /579-55B/ 214 630 1727

LAST BILL	PAYMENTS	ADJUSTMENTS
1148.65	1148.65CR	

...HED CHECK IS IN ...NT OF THE ITEMS ABOVE.

UNPAID FROM LAST BILL .00
DATE BILL MAILED APR 30
TOTAL CURRENT CHARGES DUE BY MAY 16 1137.65

TOTAL 1137.65

99 55 2146301727 579 9999 491003 000000000 000113765 03

See Reverse THANK YOU FOR PAYING BY MAIL – IT'S A PLEASURE TO SERVE YOU!

8 9 0 4 0 7 4 3 6 0 0

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC
P.O. Drawer 91
BRYAN, TEXAS 77...
08-231/1131

No 01575

DATE May 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 143.76
NEW BALANCE
DEPOSIT

PAY REGISTERED $143 and 76 cts

TO THE ORDER OF

Southwestern Bell Tele. Co.
PO Box 90
San Antonio, TX 78287

1914

COPY
NOT NEGOTIABLE

⑈001... ⑆113102315 ... 129001

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		915/367-5457 - Odessa phone bank				143.76
		Service 141.52 ~~140.65~~ 95465				
		Long Distance 2.24 95461				

MAY 22 1984

8904074360 1

Southwestern Bell Telephone

CHECK IS IN THE ITEMS ...E.

OHA FORM 9

APR 21 84 **BILL SUMMARY** /607-11B/ 915 367 5457

LAST BILL	PAYMENTS	ADJUSTMENTS
224.67	224.67CR	

Odessa phone bank

UNPAID FROM LAST BILL .00
DATE BILL MAILED APR 30
TOTAL CURRENT CHARGES DUE BY MAY 16 143.76

TOTAL 143.76

99 11 9153675457 607 0614 0621 521006 000000000 000014376 04

THANK YOU FOR PAYING BY MAIL - IT'S A PLEASURE TO SERVE YOU

...NDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91...
BRYAN, TEXAS 77...
DB 231/1131

No 01576

DATE May 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 202.69
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $202 and 69 cts

TO THE ORDER OF

Southwestern Bell Tele. Co.
PO Box 90
San Antonio, TX 78267

1914

COPY
NOT NEGOTIABLE

⑈001... ⑆113102310 01

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		806/374-4174 Amarillo phone bank				202.69
		Service3	197.93 ~~[illegible]~~ 90460			
		Long Distance	4.76 90461			
				MAY	2 2 1984	

Southwestern Bell Telephone

CHECK IS IN THE ITEMS

HA FORM 91 APR 23 84 **BILL SUMMARY** /122-11B/ 806 374 4174

LAST BILL	PAYMENTS	ADJUSTMENTS
335.86	335.86CR	

Amarillo

UNPAID FROM LAST BILL .00
DATE BILL MAILED APR 30
TOTAL CURRENT CHARGES DUE BY MAY 16 209.69

TOTAL 209.69

99 11 8063744174 122 9999 521005 000000000 000020969 06

See Reverse THANK YOU FOR PAYING BY MAIL — IT'S A PLEASURE TO SERVE YOU!

8904074360 2

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88 231/1131

№ 01577

DATE May 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 472.96
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-13124 $472 and 96 cts

TO THE ORDER OF

1910

Southwestern Bell Tele. Co.
PO Box 3025
Houston, TX 77097

COPY
NOT NEGOTIABLE

⑈0015 ⑈ ⑆113102310⑆ ⑆ 12 ⑈01

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		713/973-2133 - Houston Katy Complex phone bank				472.96
		Service 467.94	94260			
		Long Distance 5.02	94261			

DEBORA... ENTERED

MAY 2 198

8 9 0 4 0 7 4 3 6 0 3

HECK IS IN THE ITEMS E.

OHA FORM 9

Southwestern Bell Telephone

APR 23 84 **BILL SUMMARY** /325-92B/ 713 973 2133

DATE BILL MAILED APR 30 - CURRENT CHARGES DUE BY MAY 16 1229.58
LAST BILL 1229.58CR
PAYMENTS

	ADJUSTMENTS	CURRENT CHARGES	
SOUTHWESTERN BELL	.00	419.33	
AT&T INFORMATION	.00	53.63	472.96
** SUB-TOTALS	.00	472.96	

Houston Katy

AMOUNT DUE 472.96

99 92 7139732133 325 9999 511006 000000000 000047296 10

See Reverse

THANK YOU FOR PAYING BY MAIL — IT'S A PLEASURE TO SERVE YOU!

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATIO
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91
BRYAN, TEXAS 77801
88-231/1131

№ 01578

DATE Nov 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 209.01
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $209 and 01 cts

TO THE ORDER OF

Southwestern Bell Tele. Co.
PO Box 90
San Antonio, TX 73287

1914

COPY
NOT NEGOTIABLE

⑈001578⑈ ⑆113102315⑆ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOU
		El Paso phone bank 915/545-5008				209.01
		Service 195.90 Long Distance 13.11	91062 91061			

DEBORAH MELLODY
REGISTERED
1984

ATTACHED CHECK PAYMENT OF THE LISTED ABOVE.

ALOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 0 4

P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

BRYAN, TEXAS 77801
58-231/1131

DATE May 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 581.49
NEW BALANCE
DEPOSIT

PAY REGISTERED 581 and 49 cts

TO THE ORDER OF

Southwestern Bell Tele. Co.
PO box 90
San Antonio, TX 78287

1914

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102318⑆ 00[illegible]01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		512/828-4920 - San Antonio HQ				581.49
		Service 425.39		67059		
		Equipment 38.79		67055		
		Long Distance 117.31		67057		1984

DEBORAH MELLODY

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

8904074360 5

FORM 91-873-2T

Southwestern Bell Telephone

APR 27 84 **BILL SUMMARY** /505-51B/ 512 828 4920

DATE BILL MAILED MAY 04 - CURRENT CHARGES DUE BY MAY 21
LAST BILL 1654.06
PAYMENTS 1654.06CR

	ADJUSTMENTS	CURRENT CHARGES	
SOUTHWESTERN BELL	.00	425.39	
AT&T INFORMATION	.00	38.79	
AT&T COMMUNICATIONS	.00	117.31	
** SUB-TOTALS	.00	581.49	581.49

San Antonio HQ

AMOUNT DUE 581.49

99 51 5128284920 505 9999 521005 000000000 000058149 04

See Reverse THANK YOU FOR PAYING BY MAIL

TRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 915
BRYAN, TEXAS 778[illegible]
88-231/1131

№ 01581

DATE May 7, 1984
PREVIOUS BALANCE
THIS AMOUNT CHECK 203.50
NEW BALANCE
DEPOSIT

PAY REGISTERED $203 and 50 cts

TO THE ORDER OF

Federal Express Corp.
PO Box 727, Dept. A
Memphis, TN 38194

1350

COPY
NOT NEGOTIABLE

⑈001581⑈ ⑆113103[illegible] [illegible]⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 1015-1718-7 Inv. 4-108-32242 Inv. 4-101-29361 Inv. 4-104-31031 A/C 1069-9136-7 Inv. 4-097-78021 Inv. 4-103-79250 Inv. 4-102-79247 Inv. 4-497-26675	69960			203.50

ATTACHED CHECK IS PAYMENT OF THE ITE LISTED ABOVE.

ALOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 0 6

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS INC.
P.O. Drawer 913
BRYAN, TEXAS 778
88-231/1131

№ 01588

DATE
PREVIOUS BALANCE
AMOUNT THIS CHECK
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $300 00 cts

TO THE ORDER OF

Fred Hervedy
c/o Alan Rash
725 First City National Bank Bldg.
El Paso, TX 79901-1379

1460

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102316⑆ [illegible]

ITANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		May rent (thru 5/15/84) El Paso	Phone bank 91010			300.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

8 9 0 4 0 7 4 5 6 0 7

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
DAYTON, TEXAS 778[illegible]
68 231/1131

№ 01589

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK 2[illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED RB-19124 $259 and 00 cts

TO THE ORDER OF
Leonard Carpenter
c/o Russ Kent Realtor
1144 Duncanville Road
Duncanville, TX 75116

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102312⑆ ⑈0[illegible]⑈01

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		S. Dallas County phone bank - May rent thru 5/15/84 217 C East Camp Wisdom	92210			[illegible]

DEBORAH [illegible]

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 0 8

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77[illegible]
88-231/1131

№ 01590

DATE [illegible] 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $350 and 00 cts

TO THE ORDER OF

Prestonwood Development Venture
2001 Bryan Tower, 30th floor
Dallas, TX 75201

1793

COPY
NOT NEGOTIABLE

⑈001590⑈ ⑆113102316⑆ ⑈[illegible]27⑈01

8904074360 9

MITTANCE ADVICE · PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		May rent (thru 5/15/84) - 5519 Arapaho Road North Dallas phone bank				350.00
		91810				

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780[illegible]
86-231/1131

№ 01591

DATE May 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 75.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $75 and 00 cts

TO THE ORDER OF

Foreman Electric Company
119 E. 52nd Street
Odessa, TX 79762

B63

COPY
NOT NEGOTIABLE

⑈001591⑈ ⑆113102310⑆ ⑈00[illegible]⑈01

8904074 3610

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		May rent (thru 5/15/84) - Odessa phone bank	95410			75.00
					MAY 2 [illegible] 1984	

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS INC.
P.O. Drawer 913
BRYAN, TEXAS 778[illegible]
88-231/1131

No 01592

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19224 $439 and 60 cts

TO THE ORDER OF

1999

[illegible] Plaza Partnership
[illegible] N.E. Loop 410, Suite 100
San Antonio, TX 78217

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102318⑆ [illegible]

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		May rent - Suite 030 - San Antonio phone bank thru 5/15/84	95810			[illegible]

MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

LOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 1 1

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS INC.
P.O. Drawer 913
BRYAN, TEXAS 77806
08-231/1131

№ 01593

DATE [illegible] 7, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED $250 and 00 cts

TO THE ORDER OF

Highland Park West, LTD
JLL Investments, Inc.
1403 N. Sixth Street
Austin, Tx 78703

1496

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102310⑆ [illegible]

ATTANCE ADVICE PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		May rent - Austin phone bank thru 5/15/845	90610			2[illegible].00

[illegible] 2 2 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 1 2

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77803
68 231/1131

No 01594

DATE [illegible] 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $56 and 97 cts

TO THE ORDER OF

Aries Office Products Co.
16775 Addison Road, Suite 615
Dallas, TX 75248

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102310⑆ [illegible]

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	5155	Replace Check No. 1[illegible]13 - Stop payment March typewriter rental - San Antonio [illegible]		67085		[illegible].97

DEBORAH MELLODY
ENTERED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 1 3

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 912
BRYAN, TEXAS 77[illegible]
88-231/1131

No 01597

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED [illegible] 75 and 00 cts

TO THE ORDER OF

Peggy Brodersen
16811 Rustic Meadows
Dallas, TX 75248

1163

COPY
NOT NEGOTIABLE

⑈001597⑈ ⑆113102315⑆ [illegible]

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse personal expenses for COTV phone bank refreshments	82000			7[illegible].00

DEBORAH [illegible]
ENTERED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 1 4

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC
P.O. Drawer 913
BRYAN, TEXAS 77801
08 231/1131

No 01598

DATE May 1[illegible], 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 16.73
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-[illegible] $16 and 73 cts

TO THE ORDER OF
City of Duncanville
Utility Department
PO Box 380280
Duncanville, Tx 75138-0280

-0-

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102311 [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Water usage - South Dallas County phone bank	92295			16.73

[illegible] ORAN MELLODY
[illegible]TERED
[illegible] 2 2 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

COHA FORM 91-873-2T

8 0 4 0 7 4 3 6 1 5

SE KEEP THIS STUB FOR YOUR RECORD
Y OF DUNCANVILLE OFFICE HOURS
UTILITY DEPARTMENT MON - FRI
POST OFFICE BOX 380280 8 AM 5 PM
UNCANVILLE, TEXAS 75138-0280 PH. 296-1401

SERVICE TO: 04/13
SERVICE ADDRESS: 217-C E CAMP [illegible]

METER READING PREVIOUS: 253
PRESENT: 255
CONSUMPTION 1,000'S: 2

ACCOUNT NUMBER: 006-00560-00

[illegible] .00 [illegible] 4.50 [illegible] 3.25
[illegible] 9.00

CODE EXPLANATION: S SEWER, C CREDIT, R REFUSE
W WATER, B BALANCE
DUE DATE: 05/15/84
TOTAL DUE: 16.73

RM 5/5/84

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88 231/1131

No 01599

DATE 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 220.61
NEW BALANCE
DEPOSIT

PAY REGISTERED 220 and 61 cts

TO THE ORDER OF

Elizabeth Murley
1620 Waterston #202
Austin, TX 78703

1485

COPY
NOT NEGOTIABLE

⑈001599⑈ ⑆113102316⑆ ⑈0[illegible]⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse expenses as follows:					220.61
		FEC report Krueger	56.40	61001			
		Meals	10.86	54970			
		Telephone	6.75	54980			
		Entertainment	13.76	54940			
		Airfare	75.00	54910			
		Lodging	51.84	54960			

2 1984

LOHA FORM 91-873-2T

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

8 9 0 4 0 7 4 3 6 1 0

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88-231/1131

No 01600

DATE [illegible], 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $59 and 09 cts

TO THE ORDER OF
Michalyn J. Jones
3600 Greystone #7[illegible]
Austin, TX 78731

1499

COPY
NOT NEGOTIABLE

⑈001[illegible] ⑆113102318⑆ [illegible]

8 9 0 4 0 7 4 3 6 1 7

ATTANCE ADVICE PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Expense Reports dated 5/[illegible]/84 & 5/12/84 Houston Dinner				[illegible]
		Meals 1.2[illegible] Lodging 51.[illegible]4	73530			

DEBORAH M[illegible]
ENTE[illegible]

MA[illegible] 2 2 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88-231/1131

No 01801

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK
NEW BALANCE
DEPOSIT

PAY REGISTERED $458 and 00 cts

TO THE ORDER OF

Jack Kemp
2252 Rayburn Office Building
Washington, DC 20515

-0-

COPY
NOT NEGOTIABLE

⑈001.01⑈ ⑆113102316⑆ [illegible]

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse airfare for Dallas Dinner 4/30/84	73309			[illegible]

MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

8904074361 8

RIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
98-231/1131

No 01602

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 75.35
NEW BALANCE
DEPOSIT

PAY REGISTERED NO-13324 $75 and 35 cts

TO THE ORDER OF

1535

Yvonne Kohutek
1800 N. E. Loop 410, Suite 070
San Antonio, TX 78217

COPY
NOT NEGOTIABLE

⑈001[illegible]2⑈ ⑆113102318⑆ [illegible]

8904074 3619

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse expenses as follows:					75.35
		Rally postage	40.00	82008			
		Videotape	11.35	69900			
		Federal Express	24.00	69960			

DEBORAH MELLODY
ENTERED

1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778[illegible]
88-231/1131

№ 01603

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 47.70
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $47 and 70 cts

TO THE ORDER OF

Loews Anatole Hotel
2201 Stemmons
Dallas, TX 75207

1555

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102316⑆ [illegible]⑈01

8 9 0 4 0 7 4 3 6 2 0

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Ref AVW 105511 3/5/84 - projection equipment for 3/7/[illegible] phone bank [illegible]	90090			47.70

MAY 2 2 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORP ... TEXAS
P.O. Drawer
BRYAN, TEXAS
88-231/1131

L 2 01804

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 200.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $200 and 00 cts

TO THE ORDER OF

-0-

Kent Martin
4345 Carter Creek Parkway
Bryan, TX 77802

COPY
NOT NEGOTIABLE

⑈001... ⑆113102316⑈ ...01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Contract Labor	8200 8			200.00

DEBORAH MELLODY
ENTERED

CHECK REQUEST

5-9-84
DATE CHECK TO BE WRITTEN

REQUEST DATE

PLEASE ISSUE CHECK AS FOLLOWS

Payable to Kent Martin $ 200.00

Address 4345 Carter Creek Pkwy (mail to Weaver in Bryan)
Bryan, TX 77802

Explanation
Contract Labor - Victory Party setup
delivery
worked for Lanny Wyles

Charge GR

5/8/84

Department Gramm By DM Approved

A-001

8904074362 1

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 77801
88-231/1131

№ 01605

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 845.97
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $845 and 97 cts

1575

TO THE ORDER OF

Richard McBride
PO Box 4
Round Rock, TX 78664

COPY
NOT NEGOTIABLE

⑈001605⑈ ⑆113102310⑆ ⑈0[illegible]27⑈01

8904074362 2

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Expense reports dated 5/5/84					845.97
		Airfare	270.00	56210			
		Telephone (Bemis)	139.25	58180			
		Transportation	45.[illegible]	56290			
		Lodging	150.84	56260			
		Victory Party Flags	230.[illegible]	82008			
					MAY		

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88-231/1131

№ 01607

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 372.01
NEW BALANCE
DEPOSIT

PAY REGISTERED $372 and 01 cts

TO THE ORDER OF

1914

Southwestern Bell
PO Box 90
San Antonio, TX 78287

COPY
NOT NEGOTIABLE

⑈001607⑈ ⑆113102316⑆ [illegible]

ADVANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		806/795-7270 - Lubbock phone bank operation	98000			[illegible].01

[illegible] 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

8 9 0 4 0 7 4 3 6 2

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780
88 231/1131

No 01608

DATE [illegible], 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED $591 and 67 Cts

TO THE ORDER OF
Dennis Smith
2451 Stemmons
Dallas, TX 75207

1890

COPY
NOT NEGOTIABLE

⑈001608⑈ ⑆113102316⑆ [illegible]⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Expense Reports dated 4/2[illegible] & 5/5/[illegible]					591.67
		Victory Party	[illegible].54	82008			
		Transportation	92.00	58190			
		FW Fundraiser	15.00	75990			
		Tips	6.00	58100			
		Meals	11.63	58170			
		Telephone	151.50	58180			

MAY 22 1984

ATTACHED CHECK IS PAYMENT OF THE ITEM LISTED ABOVE.

ALOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 2 4

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 7780[illegible]
[illegible]

NO 01609

DATE May [illegible], 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 557.88
NEW BALANCE
DEPOSIT

PAY REGISTERED $557and88ct

TO THE ORDER OF

Rich Sofinowski
PO Box 511
San Angelo, Tx 76902

COPY
NOT NEGOTIABLE

[illegible]

[illegible]

[illegible]

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780
88-231/1131

No 01610

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 86.31
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $86 and 31 cts

TO THE ORDER OF

Texas Power & Light Co.
Box 360100
Duncanville, TX 75138

1937

COPY
NOT NEGOTIABLE

⑈001610⑈ ⑆113102316⑆ ⑈0122⑈01

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 151171161800 Duncanville phone bank electricity usage		92295		86.31

1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

HA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 2 6

TPL

ELECTRIC SERVICE BILL

PAY THIS AMOUNT

EXPLANATION OF RATE WILL BE FURNISHED ON REQUEST

OFFICE	151171161800
NAME	PHIL GRAMM
Pre. KWH Read	7670
DATE	04 26
KWH MULT	10
Pres. KWH Read	7581
DATE	03 27
CURRENT KWH	890
OTHER KWH	
GUARD LITE	
PRES. KW READ	.80
MISC	
KW MULT	10.00
CURRENT AMOUNT	82.20
METERED KW	R
SALES TAX	4.11
BILLED KW	R
DEP AND/OR INT APPLD	
RATE CODE	201001
TOTAL CURRENT MO BILL	86.31
BALANCE	
PAYMENT AFTER	052384
TOTAL DUE	86.31

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77...
88 231/1131

No 01611

DATE [illegible]
PREVIOUS BALANCE
THIS AMOUNT CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED $374 and 75 cts

TO THE ORDER OF

1580

Dot McCalpin
2203 Ridge Crest
Richardson, TX 75080

COPY
NOT NEGOTIABLE

⑈001611⑈ ⑆113102318⑆

8904074362 7

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Expense Report dated 4/21/84					374.75
		Lodging	[illegible].03	56460			
		Meals	72.40	56470			
		Telephone	3.32	56480			
		Transportation	25.00	56490			

ATTACHED CHECK PAYMENT OF THE LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

P.O. Drawer 913
BRYAN, TEXAS 77
88 231/1131

№ 01612

DATE May 1, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1,111.16
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-23124 $1111 and 16 cts

TO THE ORDER OF
Southwestern Bell
PO Box 90
San Antonio, TX 78287

1914

COPY
NOT NEGOTIABLE

⑈001112⑈ ⑆111102316⑈ 00[illegible]

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		512/192-5852 - Austin WATS Usa,	61057			1,111.16

2 2 1984

8 9 0 4 0 7 4 3 6 2 8

Southwestern Bell Telephone

CHECK IS IN THE ITEMS E.

ALOHA FORM

MAY 01 84 **BILL SUMMARY** /601-59B/ 512 192 5852

DATE BILL MAILED MAY 08 - CURRENT CHARGES DUE BY MAY 24

LAST BILL			1264.60
PAYMENTS			1264.60CR
	ADJUSTMENTS	CURRENT CHARGES	
SOUTHWESTERN BELL	.00	74.78	
AT&T COMMUNICATIONS	.00	1036.38	
** SUB-TOTALS	.00	1111.16	1111.16

AW 5/12/84 Austin WATS

AMOUNT DUE 1111.16

99 59 5121925852 601 9999 521007 000000000 000111116 10

See Reverse THANK YOU FOR PAYING BY MAIL — IT'S A PLEASURE TO SERVE YOU!

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O Drawer 91
BRYAN, TEXAS 77
88-231/1131

No 01613

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 422.20
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $422 and 20 cts

TO THE ORDER OF

Southwestern Bell
PO Box 3025
Houston, TX 77097

1910

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102316⑆ [illegible]

TANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		713/529-0322 - Houston Eastside phone bank				422.20
		Service LD 399.73	93462			
		22.47	93461			

MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS ABOVE.

9904074362 9

Southwestern Bell Telephone

MAY 01 84 **BILL SUMMARY** /900-55B/ 713 529 0322

DATE BILL MAILED MAY 08 - CURRENT CHARGES DUE BY MAY 24

LAST BILL			1237.61
PAYMENTS			1237.61CR
	ADJUSTMENTS	CURRENT CHARGES	
SOUTHWESTERN BELL	.00	361.32	
AT&T INFORMATION SYS	.00	49.16	
AT&T COMMUNICATIONS	.00	11.72	
** SUB-TOTALS	.00	422.20	422.20

Houston Eastside phone bank

AMOUNT DUE 422.20

99 55 7135290322 900 9999 511010 000000000 000042220 10

See Reverse THANK YOU FOR PAYING BY MAIL — IT'S A PLEASURE TO SERVE YOU!

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 7780
58-231/1131

No 01614

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 472.91
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-13124 $472 and 91 cts

TO THE ORDER OF

Southwestern Bell
PO Box 3025
Houston, TX 77097

1910

COPY
NOT NEGOTIABLE

⑈001614⑈ ⑆113102316⑆ 27001

TANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		713/943-0197 - Houston Gulf Freeway phone bank				472.91
		Service 472.41	93862			
		LD .50	93861			
					1984	

8 9 0 4 0 7 4 3 6 3 0

Southwestern Bell Telephone

MAY 01 84 **BILL SUMMARY** /913-55B/ 713 943 0197

CK IS IN E ITEMS

DATE BILL MAILED MAY 08 - CURRENT CHARGES DUE BY MAY 24

LAST BILL			1554.70
PAYMENTS			1554.70CR
	ADJUSTMENTS	CURRENT CHARGES	
SOUTHWESTERN BELL	.00	414.81	
AT&T INFORMATION SYS	.00	58.10	
** SUB-TOTALS	.00	472.91	472.91

Houston Gulf Freeway

AMOUNT DUE 472.91

99 55 7139430197 913 9999 511010 000000000 000047291 08

THANK YOU FOR PAYING BY MAIL - IT'S A PLEASURE TO SERVE YOU!

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P O Drawer 913
BRYAN, TEXAS 77801
68 231/1131

№ 01615

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 71[illegible].70
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $715 and 70 cts

TO THE ORDER OF

Pat Black
6127 Sanford
Houston, TX 77096

1125

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102316⑆ ⑈[illegible]27⑈01

8 9 0 4 0 7 4 3 6 3 1

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Expense Reports dated 4/2[illegible] & 5/5/84					71[illegible].70
		Postage	200.00	82008			
		Victory Party	225.00	82008			
		Delivery	6.50	65073			
		Yard Signs	35.59	80800			
		Rally	106.00	82008			
		Refreshments	140.61	65095			
							1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

IA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88 231/1131

№ 01616

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 472.99
NEW BALANCE
DEPOSIT

PAY REGISTERED $472 and 99cts

TO THE ORDER OF

Southwestern Bell
PO Box 3025
Houston, TX 77097

1910

COPY
NOT NEGOTIABLE

⑈001 1⑈ ⑆113102310 ⑈ ⑈01

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		713/522-1984 - Houston Bq				472.99
		Equipment 89.04	65055			
		Service 144.05	65059			
		Long Distance 239.90	65057			
				MAY 22 1984		

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

8904074363 2

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780
88-231/1131

P 01617

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-[illegible] 97 and 69 cts

TO THE ORDER OF

1850

Laurie Rich
Petty Cash
2451 Stemmons
Dallas, TX 75207

COPY
NOT NEGOTIABLE

⑈001617⑈ ⑆113102310⑆ [illegible]

8904074363 3

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Replenish petty cash fund as follows:				97.69
		Victory Party 97.69	82008			

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O Drawer 913
BRYAN, TEXAS 7780.
88 231/1131

№ 01618

PAY REGISTERED $1500 and 00 cts

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1500.00
NEW BALANCE
DEPOSIT

TO THE ORDER OF

Carol Reed & Associates
2506 McKinney Suite A
Dallas, TX 75201

1813

COPY
NOT NEGOTIABLE

⑈001[illegible] ⑆113102315⑈ [illegible]

TANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Consulting Fee thru 5/15/84	57850			
					Net	1500.00

ORM 91-873-2T

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88 231/1131

No 01619

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 3000.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19224 $3000 and 00 cts

TO THE ORDER OF

RHM, Inc.
P. C. Box 4
Round Rock, TX 78664

1840

COPY
NOT NEGOTIABLE

⑈001619⑈ ⑆113102318⑆ [illegible]⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Consulting fee thru 5/15/84	56250		Net	3000.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 3 5

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780.
BB 231/1131

No 01620

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1500.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $1500 and 00 cts

TO THE ORDER OF
Pat Black
6127 Sanford
Houston, TX 77096

1125

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102315⑆ [illegible]

R 3 0 4 0 7 4 3 6 3 6

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Consulting Fee Thru 5/15/84	51450			
					Net	1500.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

4 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77...
68 231/1131

No 01621

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 88.20
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 88 20 cts

TO THE ORDER OF
Gerda Brandes
4514 Duquesne Drive
San Antonio, TX 78229

1150

COPY
NOT NEGOTIABLE

⑈001621⑈ ⑆113102316⑆ 00X 127P01

89040743637

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84				
		Salary 100.00				
		FICA (6.70)	21010			
		FIT (5.10)			Net	88.20

DEBORAH MELLODY
ENTERED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780
68-231/1131

No 01622

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 937.80
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-13124 $937 and 80 cts

TO THE ORDER OF
Elizabeth S. Hurley
1620 Waterston #202
Austin, TX 78703

1485

COPY
NOT NEGOTIABLE

⑈001622⑈ ⑆113102316⑆ [illegible]

8904074363 8

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84				
		Salary 1300.00				
		FICA (87.10)				
		FIT (275.10)				
				21010	Net	937.80

DEBORAH MELLO
ENTERED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

HA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 3 9

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77[illegible]
BB 231/1131

N 2 01623

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 436.65
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 436 and 65 cts

TO THE ORDER OF

Michalyn J. Jones
3600 Greystone #702
Austin, TX 78731

1499

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102310[illegible]

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84				
		Salary 550.00				
		FICA (36.85)				
		FIT (76.50)		21010		Net 436.65

DEBORAH MELLODY
NTERED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE

8 9 0 4 0 7 4 3 6 4 0

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
68 231/1131

No 01624

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 128.95
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $128 and 95 cts

TO THE ORDER OF
Jeannette A. Kelley
6106 Vance Jackson, D-16
San Antonio, TX 78230

1515

COPY
NOT NEGOTIABLE

⑈001624⑈ ⑆113102316⑆ [illegible]

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DEBORAH MELLODY
ENTERED
MAY 22 1984

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84 Salary 150.00 FICA (10.05) FIT (11.00)	21010		Net	128.95

8 9 0 4 0 7 4 3 6 4 1

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 778
88 231/1131

No 01625

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 215.85
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $215 and 85 cts

TO THE ORDER OF
Yvonne L. Kohutek
13123 Country Trail
San Antonio, TX 78216

1535

COPY
NOT NEGOTIABLE

⑈001625⑈ ⑆113102318⑆ ⑈0000001

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84				
		Salary 250.00				
		FICA (16.75)				
		FIT (17.40)				
			21010		MAY 22 1984	
					Net	215.85

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 778[illegible]
68 231/1131

No 01626

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 509.30
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $509 and 30 CTS

TO THE ORDER OF
Dorothy E. McCalpin
2203 Ridge Crest
Richardson, TX 75080

1580

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102315⑆ [illegible]⑈01

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84				
		Salary 600.00				
		FICA (40.20)				
		FIT (50.50)				
			21010		Net	509.30

DEBORAH [illegible] ENTERED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PH'L GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88 231/1131

12 01627

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 250.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-28124 $250 and 00 cts

TO THE ORDER OF
Loy Norris
245 S. W. Dian
Burleson, TX 76028

1683

COPY
NOT NEGOTIABLE

⑈001627⑈ ⑆113102316⑆

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84 Salary 500.00 FICA (33.50) FIT (216.50)	21010			250.00

DEBORAH ME
ENTERED
MAY 22 1984
Net

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77...
88 231/1131

No 01628

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 411.80
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $411 and 80 cts

TO THE ORDER OF
Laurie Mae Rich
6019 Ridgecrest #207
Dallas, TX 75231

1850

COPY
NOT NEGOTIABLE

⑈001628⑈ ⑆113102316⑆ ⑈0047...⑈

89040743644

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84 Salary 500.00 FICA (33.50) FIT (54.70)	21010		Net	411.80

MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS INC.
P.O. Drawer 913
BRYAN, TEXAS 77[illegible]
[illegible]-231/1131

No 01829

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 911.55
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $911 and 55 cts

TO THE ORDER OF
D. Bemis Smith
2451 Stemmons
Dallas, TX 75207

1890

COPY
NOT NEGOTIABLE

⑈001829⑈ ⑆113102316⑆ [illegible]

8904074364.5

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84				
		Salary 1250.00				
		FICA (83.75)				
		FIT (254.70)				
			21010		Net 1984	911.55

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780
38-231/1131

№ 01630

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 444.55
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $444 and 55 cts

TO THE ORDER OF

Mary Jan Waters
4655 Wild Sudigo #289
Houston, TX 77027

1990

COPY
NOT NEGOTIABLE

⑈001630⑈ ⑆113102315⑆ [illegible]

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84				
		Salary 550.00				
		FICA (36.85)				
		FIT (68.60)		21010	Net	444.55

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

2

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
08 231/1131

№ 01631

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 345.65
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $345 and 65 cts

TO THE ORDER OF
John Weaver
216 W. 26th Street
Bryan, TX 77801

1995

COPY
NOT NEGOTIABLE

⑈001631⑈ ⑆113102316⑆ [illegible]

8904074364 7

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Salary for period ended 5/15/84				
		Salary 416.67				
		FICA (27.92)				
		FIT (43.10)				
			21010		Net	345.65

MAY 22 1984

2.

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

HA FORM 91-873-2T

Department Gramm By AM Approved [illegible]

8 9 0 4 0 7 4 3 6 4 8

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION : TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778[illegible]
BB 231/1131

№ 01632

DATE [illegible] 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED ~~Rs 19[illegible]~~ $20 and 00 cts

TO THE ORDER OF

Southwest Securities
PO Box 2032
Longview, TX 75606

COPY
NOT NEGOTIABLE

⑈001632⑈ ⑆113102310⑆ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for telephone usage -	Longview			20.00
			98030			

DECORATIONS
RECEIVED
MAY 22 1984

ATTACHED CHECK IS I
PAYMENT OF THE ITEM

16

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANK[illegible] OF TEXAS, INC.
P.O Drawer 913
BRYAN, TEXAS 778[illegible]
08 231/1131

NO 01633

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED $5anOOcts

TO THE ORDER OF

Robbins Petroleum Corporation
PO Box 2347
Longview, Tx 75606

COPY
NOT NEGOTIABLE

"001633" "113102316" [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for telephone usage -	Longview 98030			[illegible]

MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

606

OHA FORM 91-873-2T

To keep matters absolutely legal, we would appreciate your reimbursing the above Corporation's for the amounts set opposite their names.

Thank you for your attention to this matter.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77[illegible]
[illegible]8-231/1131

No 01634

DATE May 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 5.00
NEW BALANCE
DEPOSIT

PAY REGISTERED ~~RD-[illegible]~~ $5 and 00 cts

TO THE ORDER OF

Stoudt Distributing Co. -0-
PO box 4147
Longview, TX 75606

COPY
NOT NEGOTIABLE

⑈001634⑈ ⑆113102316⑆ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for telephone usage -	Longview			5.00
			98030			

MAY 22 1984

560

ATTACHED CHECK IS PAYMENT OF THE ITEM LISTED ABOVE.

ALOHA FORM 91-873-2T

[illegible] legal, we would appreciate your reimbursing the above Corporation's for the amounts set opposite their names.

Thank you for your attention to this matter.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780[illegible]
88 231/1131

№ 01835

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED ~~RD 19124~~ $10 and 00 cts

TO THE ORDER OF

-0-

JW Operating
PO Box 7549
Longview, Tx 75607

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102316⑆ [illegible]⑈01

89040743651

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for telephone usage - Longview	98030			[illegible]

DEBORAH MELLODY
ENTERED
MAY 2 2 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

HA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778[illegible]
58 231/1131

No 01636

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED $50 and 100 cts

TO THE ORDER OF

Bowland Sales & Service -0-
PO Box 3[illegible]
Fort Worth, TX 76101

COPY
NOT NEGOTIABLE

⑈00[illegible]⑈ ⑆113102316⑈ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Janitorial Service - April - Fort Worth phone bank	93095			[illegible]

DEBORAH MELLOUY
ENTERED
MAY 22 [illegible]

ATTACHED CHECK IS PAYMENT OF THE ITEM LISTED ABOVE.

ALOHA FORM 91-873-2T

89040 43652

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
[illegible]-231/1131

P.O. 01637

DATE Mar. 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 16.70
NEW BALANCE
DEPOSIT

PAY REGISTERED $16 and 70 cts

TO THE ORDER OF

Countdown, Inc.
PO Box 214105
Dallas, TX 75221

-0-

COPY
NOT NEGOTIABLE

⑈001637⑈ ⑆113102315⑆ [illegible]

8 3 0 4 0 7 4 3 6 5 3

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Delivery press release to UPI 4/ [illegible]/84				16.70
		63073				

DEBORAH MELLODY

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778
66 231/1131

№ 01638

DATE May 1st, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 22.55
NEW BALANCE
DEPOSIT

PAY REGISTERED $22 and 55 CTS

TO THE ORDER OF

Countdown, Inc.
PO Box 214165
Dallas, TX 75221

COPY
NOT NEGOTIABLE

⑈001638⑈ ⑆113102316⑆

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOU
		Delivery to Oak Cliff Tribune				22.55
		63073				

ATTACHED CHECK IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

3 9 2 4 0 2 7 4 3 6 5 4

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
58 231/1131

№ 01639

DATE May 10, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $20 and 00 cts

TO THE ORDER OF

Joan Devine
9624 Ravensway
Dallas, TX 75238

COPY
NOT NEGOTIABLE

⑈001639⑈ ⑆113102316⑆ [illegible]⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for stamps for Dallas Fast (Ferries) phone bank (receipt lost)	91466			20.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

LOHA FORM 91-873-2T

8904074 3655

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91[illegible]
BRYAN, TEXAS 77[illegible]
[illegible]8-231/1131

P 01640

[illegible]ENDS OF PHIL GRAMM
[illegible] WASHINGTON D.C. CORPORATIC
P.O. DRAWER AO
[illegible]OLLEGE STATION, TEXAS 77840

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

REGISTERED RD-[illegible] $108 and 00 cts

[illegible] THE [illegible]DER

1350

[illegible]eneral Express
PO Box 727, Dept A
[illegible]emphis, TN 38194

COPY
NOT NEGOTIABLE

[illegible]001[illegible] [illegible]113102315[illegible]

[illegible]ANCE ADVICE PLEASE DETACH BEFORE DEPOSITING CHECK

[illegible]ATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 1127-88667-2 Inv. 4-118-78832 A/C 1015-1718-7 Inv. 4-115-30904, Inv. 4-11[illegible], Inv. [illegible]-114-[illegible] Inv. [illegible], Inv. 4-117-[illegible], Inv. [illegible]-121-[illegible] A/C 1069-9136-7 Inv. 4-114-88510, Inv. 4-111-79[illegible], Inv. [illegible]	69960			$108.00

[illegible]BORAH M. [illegible]
[illegible]NTERED

[illegible]384

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77...
68-231/1131

No 01641

DATE
PREVIOUS BALANCE
AMOUNT THIS CHECK
NEW BALANCE
DEPOSIT

PAY REGISTERED $23 and 25 cts

TO THE ORDER OF

Fire Star Courier, Inc. 1358
PO Box 2074
Alexandria, VA 22301-0074

COPY
NOT NEGOTIABLE

⑈001641⑈ ⑆113102318⑆ ⑈05...⑈01

8904074 3657

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	7072	Deliveries from Congressional Office				
		69960				
						.084

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77...
38 2317/1131

N2 01642

DATE [illegible] 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $277 and 74 cts

TO THE ORDER OF

Kwik Kopy Printing -0-
4620-50th Street
Lubbock, TX 79414

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102315⑆ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	005511	Printing & folding 5,000 pieces for West Texas walks - Comparison to Ron Paul		80900		277.74
						1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

8904074 3658

FRIENDS OF PHIL GRAM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY ... P.O. Drawer 91
BRYAN TEXAS 77801
88 231/1131

12 01643

DATE 5/18/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 19.71
NEW BALANCE
DEPOSIT

PAY REGISTERED 19 and 71 cts

TO THE ORDER OF
Lone Star Gas Company 1560
Po Box 220123
Dallas, TX 75222

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102318⑆ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 204196716403Frien - Gas Utilit, - Fort Worth [illegible] Bank	93095			19.71

MAY 2 2 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEM LISTED ABOVE.

ALOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 5 9

Lone Star Gas

6239 OLD GRANBURY RD
204196716403 FRIEN 686
0001444 042784 1624
0001424 0328 30
20 10143 203
91
53 1971 1971

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 77801
23-231/1131

P.O. 01644

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED $784 and 65 cts

TO THE ORDER OF

Monroe 1655
Box 9000R
Morristown, NJ 07960

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102312⑆ [illegible]

8904074366 0

ITTANCE ADVICE PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Copier rental & supplies					[illegible]
	344772	Houston HQ	94.00				
	[illegible]	Houston HQ	36.75				312.08
	347931	Austin HQ	51.04	Hou	65015		
	345299	Austin HQ	98.70	Austin	61015		149.74
	347293	San Antonio HQ	107.61				
	348040	San Antonio HQ	107.61	San Ant	67015		322.83
	34[illegible]758	Houston HQ	78.93				
	34[illegible]74	San Antonio HQ	107.61				
	349706	Houston HQ	102.40				

MAY 2 [illegible] 1984

[illegible]HED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
68 231/1131

No 01645

DATE [illegible] 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible].00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $45 and 00 cts

TO THE ORDER OF

Dot McCalpin Photography 1580
2203 Ridgecrest
Richardson, TX 75080

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102316⑆ [illegible]

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		4/30/84 fundraiser - Dallas - photographs	73308			45.00

[illegible] 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

[illegible]HA FORM 91-873-2T

8904074366

FRIENDS OF PH'L GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88 231/1131

No. 01646

DATE [illegible] 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $231 and 72 cts

TO THE ORDER OF

-0-

Houston Marriott Hotel - West Loop [redacted]
1750 W. Loop South
Houston, TX 77027

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102310⑆ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		4/26/84 - Leadership meeting 82000				231.72

DEBORAH ME[illegible]
ENTERED
MAY 22 1984

ATTACHED CHECK IS I[illegible] PAYMENT OF THE ITEM LISTED ABOVE.

ALOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 6 2

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88 231/1131

No 01647

DATE May 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK $150.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $150 AND 00 CTS

TO THE ORDER OF

Oak Cliff Tribune -0-
PO Box 24363
Dallas, TX 75224

COPY
NOT NEGOTIABLE

⑆113102316⑆

REMITTANCE ADVICE PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Signature 1983 - man of the Year				
		54700				

DEBORAH MELLODY
ENTERED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

A FORM 91-873-2T

FRIENDS OF PHIL GRAM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 9[illegible]
BRYAN, TEXAS 778[illegible]
68 231/1131

№ 01649

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED [illegible] $66 and 41 cts

TO THE ORDER OF

Payne Letter Shop -0-
1800 N.E. Loop 410, Suite 050
San Antonio, TX 78217

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102310⑆ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		San Antonio printing letterhead & postcards	67080			66.41

DEBORAH MELLODY
ENTERED
[illegible] 2 2 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

LOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 6 5 4

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
CB 231/1131

No 01650

DATE May 10, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 230.55
NEW BALANCE
DEPOSIT

PAY REGISTERED $230 and 55 cts

TO THE ORDER OF

Praxis List Company 1785
PO Box 2352
Austin, TX 78768

COPY
NOT NEGOTIABLE

⑈001650⑈ ⑆113102310⑆ [illegible]

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	1768	Computer Services 3 [illegible] 22 primary [illegible]		[illegible]	90010	
	1766	Shipping - $61.91			90000	
	1765	Computer Services - Dallas Gramm Favorables - $[illegible].04			90010	230.55

DEBORAH MELLODY
ENTERED
MAY 22 1984

LOHA FORM 91-873-2T

FRIENDS OF PHIL GRAM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 778..
8 231/1131

№ 01651

DATE [illegible] 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible].17
NEW BALANCE
DEPOSIT

PAY REGISTERED $185 and 17 cts

TO THE ORDER OF

Qualified Printers, Inc. —0—
2003 W. Big Spring
Midland, TX 79701

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102316 [illegible] .27⑈01

MITTANCE ADVICE PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		printing for Midland fundraiser	75991			185.17

DEBORAH MS[illegible]
ENTERED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

HA FORM 91-873-2T

FRIENDS OF PH'L GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91
BRYAN, TEXAS 77
68 231/1131

№ 01652

DATE May 1, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 527.30
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $527 and 30 cts

TO THE ORDER OF

Republican Party of Nueces County
4433 Gollinar
Corpus Christi, TX 78411

1820

COPY
NOT NEGOTIABLE

⑈001652⑈ ⑆113102310⑆ ⑆ 22⑈01

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		1980 & 1982 Primary Voter Lists (2) one locally & one for Austin	98010			527.30

DEBORAH MELLODY
ENTERED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

8904074 3667

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 77801
58 231/1131

No 01653

DATE May 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 30,641.64
NEW BALANCE
DEPOSIT

PAY REGISTERED $30641 and 64 cts

TO THE ORDER OF

Karl Rove & Company
Po Box 1902
Austin, TX 78767

1860

COPY
NOT NEGOTIABLE

⑈001653⑈ ⑆113102319⑆ [illegible]

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	1617	Continuous lettern[illegible] to Crowe (Bedford)-		$[illegible].74	79006	
	1619	Rally Cards (360,000) - $18,493.[illegible]			82008	
	1620-	Aggie Mailing - $1[illegible]			79005	
	1618	Artwork for mailings (Aggie & Rally Cards) - $[illegible].86			79001	
	1597	Telephone expense 2/19 - 3/18/84 - $[illegible]			69980	
						30,641.64

MELLO[illegible]
[illegible]TERED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

8 9 0 4 0 7 4 3 5 5 8

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780
08 231/1131

No 01654

DATE [illegible], 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $35 and 00 cts

TO THE ORDER OF

Sun Publishing Company -0-
900 Magoffin Avenue
El Paso, TX 79998

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102315⑆ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Copying rally invitations 5/3/84	82008			35.00

DEBOR

MAY 22 1984

ATTACHED CHECK IS PAYMENT OF THE ITE LISTED ABOVE.

HA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
[illegible] 231/1131

No 01655

PAY REGISTERED $420 and 94 cts

DATE May 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 420.94
NEW BALANCE
DEPOSIT

TO THE ORDER OF

Southwestern Bell 1901
PO Box 660012
Dallas, TX 75394

COPY
NOT NEGOTIABLE

⑈001[illegible] ⑆11310231[illegible] [illegible]

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		214/634-7241 - Dallas Stevens [illegible]				420.94
		Service 41965	92662			
		LD 1.29	92661			

MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

8904074 3670

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91[illegible]
BRYAN, TEXAS 77[illegible]
[illegible]8-231/1131

No 01656

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK [illegible]
NEW BALANCE
DEPOSIT

PAY REGISTERED [illegible] 494 [illegible] 80 cts

TO THE ORDER OF

Southwestern Bell
PO Box 660012
Dallas, TX 75344

1901

COPY
NOT NEGOTIABLE

⑈001[illegible] ⑆113102315⑈ [illegible]

8904074367

ITTANCE ADVICE PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		214/780-0260 - S Dallas phone bank				494.80
		Service 492.64	92262			
	Long Distance	2.16	92261			

FILED
MAY 22 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 778..
68 231/1131

№ 01657

DATE May 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 495.23
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-18124 495 and 23 cts

TO THE ORDER OF

Southwestern Bell
PO Box 660012
Dallas, TX 75394

1901

COPY
NOT NEGOTIABLE

⑈001657⑈ ⑆113102310⑈ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		214/343-1864 - E Dallas phone [illegible]				495.23
		Service 495.23	91462			

MAY 2 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FORM 91-873-2T

8904074 3672

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88-231/1131

№ 01659

DATE [illegible] 10, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 341.18
NEW BALANCE
DEPOSIT

PAY REGISTERED $341 and 18 cts

TO THE ORDER OF

Southwestern Bell Tele. Co. 1901
PO Box 660012
Dallas, TX 75394

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102318⑆ [illegible]

8904074367 3

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		817/294-3731 - Fort Worth phone bank				341.18
		Service 339.56	93062			
		Long Distance 1.62	93061			

ATTACHED PAY

HA FORM 91-875-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77[illegible]
38-231/1131

No 01660

DATE May 1[illegible], 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 15.57
NEW BALANCE
DEPOSIT

PAY REGISTERED 19 and 57 cts

TO THE ORDER OF

2377 Stemmons Venture 1998
2377 Stemmons
Dallas, TX 75207

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102316⑆ [illegible]01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	1561	Paper towels - Dallas Hq	63050			15.57

REGISTERED
2 2 1984

ATTACHED CHECK IS I
PAYMENT OF THE ITEM
LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88-231/1131

№ 01661

DATE [illegible] 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1,042.54
NEW BALANCE
DEPOSIT

PAY REGISTERED 1042 and 54 cts

TO THE ORDER OF

Sun World Corporation -0-
900 Magoffin
PO Box 20000
El Paso, TX 79998

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102315⑆ [illegible]27⑈01

8904074367

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse utilities paid for El Paso [illegible] bank			1	1,042.54
		Electricity 949.67 Gas 81.93 Water 10.94	91095			

DEBORAH M[illegible]
[illegible]

1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77...
68 231/1131

No 01662

DATE May 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1,279.34
NEW BALANCE
DEPOSIT

PAY REGISTERED $1279and34cts

TO THE ORDER OF

Sheraton Spindletop Inn -0-
P.O. Box 2712
Beaumont, TX 77706

COPY
NOT NEGOTIABLE

⑆113102316⑆

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Beaumont fundraiser				1,279.34
		Food 972.00	75993			
		Drink 307.34	75994			

DEPOSITED TO THE CREDIT OF MELLODY

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 81-873-ZT

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
08-231/1131

№ 01663

DATE May 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 392.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-15124 $392 and 00cts

TO THE ORDER OF

V Lance Tarrance & Associates, Inc. 1930
PO Box 90276
Houston, TX 77273
Attn: J. Lindley

COPY
NOT NEGOTIABLE

⑈001663⑈ ⑆113102316⑆ [illegible]⑈01

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	10184	Phone usage - 4/9 - 5/5/84 980 hours	90000			392.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77803
88-231/1131

No 01664

DATE May 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 120.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $120 and 00 cts

TO THE ORDER OF

United Maintenance Service
6400 Independence Parkway #1506
Plano, TX 75023

COPY
NOT NEGOTIABLE

⑈001664⑈ ⑆113102310⑆ ⑈01

8904074367 8

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Cleaning Service - Prestonwood phone bank - Dallas	(Arapaho) 91895			120.00

DEBORAH M
NTE

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 778[illegible]
BB 231/1131

№ 01665

DATE [illegible] 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 97.64
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $97 and 64 cts

TO THE ORDER OF

Warden Stationers 1982
6101 Burnet Road
Austin, TX 78757

COPY
NOT NEGOTIABLE

⑈001665⑈ ⑆113102310⑆ [illegible]

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	6104	Austin HQ - Office Supplies	61050			97.64

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778[illegible]
08 231/1131

№ 01666

DATE Ma[illegible] 1[illegible], 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1,[illegible].79
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-13124 $1349 and 79 cts

TO THE ORDER OF

Ruth Cymber 1284

COPY
NOT NEGOTIABLE

⑈001[illegible]⑈ ⑆113102310⑆ [illegible]⑈01

[illegible]UTTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Expense Report - Election Week				1,349.79
		Airfare 826.00	69990			
		Meals 131.18				
		Lodging 322.33				
		Transportation 50.00				
		Office Supplies 20.28				

DEBORA[illegible]
ENTE[illegible]

MAY 2 2 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

[illegible]HA FORM 91-873-2T

2200

May 3 19 84

To Western Union Telegraph Co.
P. O. Box 26163
Richmond, VA 23291

For Telegraphic service

DEPOSITS

total		
this check	49	90
balance		

69900

-0-

8 9 0 4 0 7 4 3 6 8 1

ENTERED

MAY 17 1984

8 9 0 4 0 7 4 3 6 8 2

1060

2201

May 3 19 84

American Express

Wendy	To 4/29-5/6	American	$293	
PG	3/16-3/19	Cont.	328	
		American	61	
Norris	3/22-3/24	"	40	
PG	For 3/22-3/26	Delta	504	
PG	4/13-4/22	American	453	total
Wendy	4/5-4/9	"	421	
PG	2/1 Credit	Cont.	-40	this check 2,095 - 00
	Card charge		35	
				balance

DEPOSITS

Gramm 2055.00 54710

Nevins 40.00 54010

DEBORAH [illegible]

MAY 17 1984

8 9 0 4 0 7 4 3 6 8 3

1400

5480

2208

May 15, 19 84

To General Telephone Co. of the Southwest
P.O. Box 2933
Austin 78769-2933

For Long distance calls made on 779-9613 (Bryan)

	bal brot forw'd		
	total		
	this check	136.	23
	balance		

MAY 17 1984

8904074356884

2210

May 21 1984

To C&P Telephone
930 H Street, N.W.
Washington, D. C. 20001

For Conference calls

Total		
This check	187	48
Balance		

69980

DEBORAH MELLOSY
ENTERED

JUN 8 1984

2211

May 23 19 84

To Secretary of the Senate

Report of Hance and Doggett

For

DEPOSITS

total		
this check	25	50
balance		

-0-

69900

DEBORAH MELTON ENTERED

JUN 8 1984

8 9 0 4 0 7 4 3 6 9 8 6

1250

2212

May 23 19 84

To Coca Cola

DEBITS

For Cokes for constituents visiting office

total		
this check	9	.75
balance		

64900

DEBORAH MEECH
ENTERED

JUN 8 1984

#1170

Campack

Wire # 33

A/C 41 864 09 000

American Security Bank
635 Mass. Ave. NW
Washington DC 20001

$30,000.00

payment on A/C

...pack Misc	60980	186.24 y
...n Record Maint	60998	7293.85 y
...nt. TX Letters	60988	1692.02 y
...EC Report	60996	570.00 y
...inting	79006	20,257.89

DEBORAH MELLODY
ENTERED

JUN 8 1984



TO TH
ORDER
OF

Capito
300 Firs
Washington,

⑈001667⑈

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHEC

DATE	INVOICE NUMBER	DESCRIPTION OF P
		Club Member MC7949 - PAC R

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91
BRYAN, TEXAS 77801
88-231/1131

№ 01668

DATE 6-4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 215.45
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $215 and 45 cts

TO THE ORDER OF

Dot McCalpin
2203 Ridge Crest
Richardson, TX 75080

1580

COPY
NOT NEGOTIABLE

⑈001668⑈ ⑆113102316⑆ ⑈0[illegible]427⑈01

9 9 0 4 0 7 4 3 6 9 2

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for cod charges for bus shipments from phone banks	90000			215.45

DEBORAH MELLO[illegible]
ENTERED
JUN 18 1984

ATTACHED CHECK IS I[illegible] PAYMENT OF THE ITEM LISTED ABOVE.

6

ORM 91-8/3-2T

Date 1984

Amount paid

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77803
88-231/1131

№ 01669

DATE 6-4 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 53.92
NEW BALANCE
DEPOSIT

PAY REGISTERED $53 and 92 cts

1535

TO THE ORDER OF

Yvonne Kohutek
1800 N. E. Loop 410, Suite 070
San Antonio, TX 78217

COPY
NOT NEGOTIABLE

⑈001669⑈ ⑆113102316⑆ ⑈0042427⑈01

89040743693

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for victory party expenses 82008				53.92

DEBORAH MELLO
ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

6-

ALOHA FORM 91-073-2T

Date 1984 Amount paid

Winn's Paper prod. Pct. Walk	7.97
Donutshop Precinct Walk	13.00
U,S. Postoffice-Mailing of checks	2.24
Republ. Hdqutrs-Address Lists	4.70
Rubber Stamp	6.80
Trailways-Mailing of Banner	6.60
Office Supplies	

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91?
BRYAN, TEXAS 77...
88-231/1131

№ 01670

DATE 6-4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 2,572.85
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $2572 and 85 cts

TO THE ORDER OF
David Godfrey
PO Box 3864
Midland, TX 79702

-0-

COPY
NOT NEGOTIABLE

⑈001670⑈ ⑆113102316⑆ ⑈00[illegible]⑈01

89040743694

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for Midland fundraiser expenses				2,572.85
		labor 225.00	~~[illegible]~~	76000		
		food 2,097.85	75993			
		liquor 250.00	75994			

DEBORAH MELLO... ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

Date _____ 1984 || Amount paid _____

Country Club

Playing Cards	3	
Dining Room	30	[illegible]
Dining Room	31	2 Kg Beer $12..
Cigars	61	

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780.
68-231/1131

No 01671

DATE 6-4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 186.10
NEW BALANCE
DEPOSIT

PAY REGISTERED $186and10cts

TO THE ORDER OF

Action Business Services
4601 Greenville Avenue
Dallas, TX 75207

COPY
NOT NEGOTIABLE

⑈001671⑈ ⑆113102316⑆

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Printing for 4/30 fundraiser letter 79006				186.10

DEBOSITED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OMA FORM 81-873-2T

Date _____ 1984 || Amount paid 186.10

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 912
BRYAN, TEXAS 778
68-231/1131

No 01672

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 700.58
NEW BALANCE
DEPOSIT

PAY REGISTERED RB-1912 $700 and 58 cts

TO THE ORDER OF

Luce Press Clippings 1568
Box 379
Topeka, KS 66601

COPY
NOT NEGOTIABLE

⑈001672⑈ ⑆113102316⑆ [illegible]⑈01

8900407436996

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 274788 - April Service			700.58	
		TV Monitoring 50.00 Teleclips 650.58	83200 83100	DEBORAH MEL... ENTERED JUN 18 1984		

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

TF

ALOHA FORM 91-873-2T

LUCE PRESS CLIPPINGS MAXIMUM RATE PERMITTED BY LAW MAY BE ADDED TO THE AMOUNT OF ANY INVOICE NOT PAID WHEN DUE.

SS CLIPPI
BOX 379

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780..
88 231/1131

№ 01673

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 466.59
NEW BALANCE
DEPOSIT

PAY REGISTERED $466 and 59 cts

TO THE ORDER OF

Texas Press Service, Inc.
718 W. Fifth
Austin, TX 78701

1940

COPY
NOT NEGOTIABLE

⑈001673⑈ ⑆113102316⑆ 0[illegible]2427⑈01

9 0 4 0 7 4 3 6 9 7

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 90228 - April Service 83100				466.59

DEBORAH MC[illegible]
[illegible]RTERED

JUN 1 8 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 917
BRYAN, TEXAS 77[illegible]
88-231/1131

№ 01674

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 200.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $200 and 00 cts

TO THE ORDER OF

Seabrook Video
PO Box 524
Seabrook, Maryland 20706

COPY
NOT NEGOTIABLE

⑈001674⑈ ⑆113102316⑆ ⑈0[illegible]127⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		5/1/84 - video tape crew Gramm/Tower				200.00

88400

DEBORAH MELLODY
ENTERED

JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST GATE BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780[illegible]
58-231/1131

No 01675

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 15,000.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $15000and00cts

TO THE ORDER OF

P/M Consulting
Freedom House
202 E. Street, NE
Washington, DC 20002

1750

COPY
NOT NEGOTIABLE

JUN 1 8 1984

⑈001675⑈ ⑆113102316⑆ [illegible]

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Partial Invoice 355 - reimburse expenses				15,000.00

73303 Dallas Dinner 10,658.46
57380 Phone 302.98
57390 Parking 100.00
57384 Shipping 346.67
79006 Printing 48.00
73505 Flowers 880.80
73507 Music

57330 Car rental 829.73
79007 Postage 440.00
57360 Lodging 876.91

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

2 RT, DCA-DFW, Apr. @ $610.00
2 RT, DCA-DFW, Mar. @ $610.00
Brad O'Leary:
2 RT, DCA-DFW, Apr. @ $610.00

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778
88-231/1131

№ 01676

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 15,000.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $15000 and 00 cts

TO THE ORDER OF

Karl Rove & Co.
PO Box 1902
Austin, TX 78767

1860

COPY
NOT NEGOTIABLE

⑈001676⑈ ⑆113102316⑆ ⑈0042727⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUN
	1626	Home phone production	885.00	98050			
	1624	Phone bank follow-up	7,740.75	90050			
	1623 (Partial)	GOTV to undecided	6,374.25	90040			

DEBORAH MELLODY
ENTERED
JUN 18 1984

ATTACHED CHECK IS PAYMENT OF THE ITE LISTED ABOVE.

ALOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 7 0 0

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

[illegible] CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN TEXAS 778[illegible]
88 231/1131

No 01677

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 462.50
NEW BALANCE
DEPOSIT

PAY REGISTERED $462 and 50 Cts

TO THE ORDER OF

Federal Express
PO Box 727, Dept. A
Memphis, TN 38194

1350

COPY
NOT NEGOTIABLE

⑈001677⑈ ⑆113102316⑆ [illegible]⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		See attached invoice copies Various shipments	69960			462.50

DEBORAH MELLODY
ENTERED
JUN 8 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-673-2T

FRIENDS OF PHIL GRAM
A WASHINGTON D C CORPORATIO
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 919
BRYAN, TEXAS 7801
46-231/1131

No 01678

DATE June 6, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 462.30
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-18124 $462 and 30 cts

TO THE ORDER OF

General Telephone Co. of the Southwest
Ardan Shopping Center
Bryan, TX 77801

1400

COPY
NOT NEGOTIABLE

⑈001678⑈ ⑆113102316⑆ ⑈00[illegible]27⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Victory party telephones 823-8024 82008				462.30

DEBORAH MELLOW
ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780
88-231/1131

№ 01679

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 237.32
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19184 $237 and 32 cts

TO THE ORDER OF

Ace Furnace
1960 W. Northwest Highway
Dallas, TX 75220

COPY
NOT NEGOTIABLE

⑈001679⑈ ⑆113102316⑆ ⑈0[illegible]427⑈01

0 0 4 0 7 4 3 7 0 3

ENTRANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	28799	Repair a/c - Abrams Phone Bank	91430			237.32

ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

Date 1984

Amount paid [illegible]

COPIES

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778[illegible]
68-231/1131

№ 01680

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 536.79
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $536 and 79 cts

TO THE ORDER OF

AT&T Info Systems
PO Box 27-858
Kansas City, MO 64180

1085

COPY
NOT NEGOTIABLE

⑈001680⑈ ⑆113102316⑆ [illegible]27⑈01

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 0005-29522-23 4/16 384.87 5/16 151.92	67055			536.79

DEBORAH MELLODY
ENTERED
1 8 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

A FORM 91-873-2T

THIS INVOICE REPRESENTS REGULAR MONTHLY CHARGES. ACCOUNT ACTIVITY WHICH REPRESENTS ONE-TIME CHARGES WILL APPEAR ON A SEPARATE INVOICE. BALANCES DUE AND LATE PAYMENT CHARGES (IF ANY) FROM PREVIOUS INVOICES WILL APPEAR ON YOUR STATEMENT OF ACCOUNT.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91[illegible]
[illegible], TEXAS 778[illegible]
88-231/1131

№ 01681

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 37.50
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $37 and 50 cts

TO THE ORDER OF

Rancho Viejo -0-
2219 S. Whitehouse
Harlingen, TX 78550

COPY
NOT NEGOTIABLE

⑈001681⑈ ⑆113102316⑆ ⑈0742427⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Coffee for fundraiser 75994				37.50

DEBORAH [illegible] ENTERED
[illegible] 8 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

or

ALOHA FORM 91-873-2T

Date 1984 || Amc 37.50

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
DENVER, TEXAS 77[illegible]
88-231/1131

№ 01682

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 7.89
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $7 and 89 cts

TO THE ORDER OF

Lone Star Gas Company
PO Box 22013
Dallas, TX 75222

1560

COPY
NOT NEGOTIABLE

⑈001682⑈ ⑆113102316⑆ 0[illegible]2427⑈01

8904074370 6

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 1828402 20604 PHIL South Dallas gas utility	92295			7.89

DEBORAH MELLODY
ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
08-231/1131

№ 01683

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 3.84
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-18124 $3 and 84 cts

TO THE ORDER OF

Lone Star Gas Company
PO Box 220133
Dallas, TX 75222

1560

COPY
NOT NEGOTIABLE

⑈001683⑈ ⑆113102316⑈ ⑈0042927⑈01

9 9 0 4 0 7 4 3 7 0 7

ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 20 4196716403 FRIEN Fort Worth phone bank	93095		3.84	

DEBRAH MELLO
REGISTERED
JUN 1 8 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 919
BRYAN, TEXAS 77...
88-231/1131

№ 01684

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 700.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $700 and 00 cts

TO THE ORDER OF

1820

Republican Party of Texas
1300 Guadalupe, Suite 205
Austin, TX 78701
Attn: Jay Frydenlund

COPY
NOT NEGOTIABLE

⑈001684⑈ ⑆113102316⑆ ⑈0012427⑈01

8 2 0 4 0 7 4 3 7 0 8

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Labels	82008			700.00

DEPOSIT MELLODY
ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. BRAZOS AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91[illegible]
BRYAN, TEXAS 77805
68-231/1131

No 01685

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 173.58
NEW BALANCE
DEPOSIT

PAY REGISTERED $173and58cts

TO THE ORDER OF

E. Forest Copeland
PO Box 2267
Longview, TX 75606

COPY
NOT NEGOTIABLE

⑈001685⑈ ⑆113102316⑆ [illegible]⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for newspaper ad	85600		173.58	

ENTERED
DEBORAH [illegible]
JUN 8 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

ARS

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778
58-231/1191

No 01686

PAY REGISTERED RB-18124 $44 and 44 cts

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 44.44
NEW BALANCE
DEPOSIT

TO THE ORDER OF

Mark Wollock
201 Coventry Lane
Seguin, TX 78155

COPY
NOT NEGOTIABLE

⑈001686⑈ ⑆113102316⑆ [illegible]427⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		reimburse for liquor for fundraiser	75994			44.44

DEBORAH MELLODY
ENTERED
JUN 18 19[illegible]

OMA FORM 91-873-2T

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

Date [illegible] 1984

Check number 1016
Amount paid 44.44

form

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88-231/1131

No 01687

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 7.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-18124 $7 and 00 cts

TO THE ORDER OF

Fire Star Courier, Inc.
PO Box 2074
Alexandria, VA 22301-0074

1358

COPY
NOT NEGOTIABLE

⑈001687⑈ ⑆113102316⑆ ⑈0042427⑈01

8904074371

ANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

TE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	7322	April 23, 1948 - delivery to Schoener	69960			7.00

DEBORAH M... ENTERED

1984

OVE
A.
B.
C.

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 776
68-231/1131

№ 01688

9 9 0 4 0 7 4 3 7 1 2

DATE June 4, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 43.73
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $43 and 73 cts

TO THE ORDER OF

City of Duncanville -0-
Utility Department
PO Box 380280
Duncanville, TX 75138-0280

COPY
NOT NEGOTIABLE

⑈001688⑈ ⑆113102316⑆ 0[illegible]427⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 006-00560-00 - S. Dallas County phone bank water	92295			43.73

DEBORAH MC[illegible]
ENTERED
[illegible] 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88-231/1131

№ 01690

DATE June 6, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 6,504.93
NEW BALANCE
DEPOSIT

PAY REGISTERED $6504 and 93 cts

TO THE ORDER OF

First City National Bank of Bryan
301 South Texas Avenue
PO Drawer 913
Bryan, TX 77805

COPY
NOT NEGOTIABLE

⑈001690⑈ ⑆113102316⑆ ⑈0042427⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Service charge - checking account March & April	60998			6,504.93

DEBORAH MELLOW
ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

Sincerely

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 912
BRYAN, TEXAS 77805
88-231/1131

№ 01691

DATE June 8, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 9,302.60
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $9302 and 60 cts

TO THE ORDER OF

P/M Consulting Corporation 1750
Freedom House
202 E Street, NE
Washington, DC 20002

COPY
NOT NEGOTIABLE

⑈001671⑈ ⑆113102316⑆ ⑈0042427⑈01

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	355	Balance - $5,343.09 - Expense Reimbursement Travel				
	358	Partial $3,959.51 - Houston Dinner Expense				
	57310	Airfare 5045.00				
	57360	Lodging 298.09				
	73503	Houfundrais 3959.51				

DEBORAH M...
ENTE...
JUN 1 8 1984

HA FORM 91-873-2T

2 RT, DCA-DFW, Apr. @ $610.00
2 RT, DCA-DFW, Mar. @ $610.00
Brad O'Leary:
2 RT, DCA-DFW, Apr. @ $610.00

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91[illegible]
BRYAN, TEXAS 778[illegible]
58-231/1131

№ 01692

DATE June 8, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 10,000.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $10000 and 00 cts

TO THE ORDER OF

Karl Rove & Company 1860
PO Box 1902
Austin, TX 78767

COPY
NOT NEGOTIABLE

⑈001692⑈ ⑆113102316⑆ ⑈0092427⑈01

9 9 0 4 0 7 4 3 7 1 5

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	1623	Partial - GOTV letters to undecideds	90040			10,000.00

DEBORAH ME[illegible]
ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

:e I

OHA FORM 91-873-2T

#6 3/4 Business Reply Envelopes (101,000) | 3,287.71

FRIENDS OF PHIL GRAM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 912
BRYAN, TEXAS 778..
88-231/1131

№ 01693

DATE June 8, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 74.20
NEW BALANCE
DEPOSIT

PAY REGISTERED $74 and 20cts

TO THE ORDER OF

AVW Audio Visual Inc.
2241 Irving Blvd.
Dallas, TX 75207

COPY
NOT NEGOTIABLE

⑈001693⑈ ⑆113102316⑆ ⑈0042127⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	57974	Replace Check No. 1566 - check lost Rental - video equipment - May 4, 1984	82008			74.20

DEBORAH ... ENTERED
JUN 18 1984

ATTACHED CHECK IS I... PAYMENT OF THE ITEM LISTED ABOVE.

ALOHA FORM 91-873-2T

...IATIONAL B...
-8-84

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

First City National Bank of Bryan
FIRST CITY BANCORPORATION TEXAS, INC.
P.O. Drawer 9
BRYAN, TEXAS 77801
88-231/3131

№ 01695

DATE June 12, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 647.89
NEW BALANCE
DEPOSIT

PAY REGISTERED NO-10124 $647 and 89 cts

TO THE ORDER OF 1400

General Telephone Company of the Southwest
PO Box 2933
Austin, TX 78769-2933

COPY
NOT NEGOTIABLE

⑈001695⑈ ⑆113102316⑆ ⑈0042427⑈01

89040743717

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		823-8024 - victory party phones	82008			647.89

DEBORAH M.
ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

LOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

First City National Bank of Bryan
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88-231/1131

№ 01696

DATE June 12, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 143.14
NEW BALANCE
DEPOSIT

PAY REGISTERED RB-19124 $143 and 14 cts

TO THE ORDER OF 1655

Monroe Systems for Business
Box 9000R
Morristown, NJ 07960

COPY
NOT NEGOTIABLE

⑈001696⑈ ⑆113102316⑆ 0[illegible]2427⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	358151	Dallas HQ	132.40	63015			
	362847	Austin HQ	10.74	61015			
	363190	San Antonio HQ	-0-				143.14

DEBORAH MELL[illegible]
ENTERED
JUN 18 1984

.AX

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

PLEASE PAY 132.40

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

First City National Bank of Bryan
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88-231/1131

№ 01697

DATE June 12, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 11,264.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $11264 and 00 cts

TO THE ORDER OF

1468

Hobbs Bonded Fibers
PO Box 151
Groesbeck, TX 76642

COPY
NOT NEGOTIABLE

⑈001697⑈ ⑆113102316⑆ ⑈0042427⑈01

89040743719

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	6194	Airplane Charter - 3/29 - 4/21/84	54720			11,264.00

DEBORAH MELLO
ENTERED
JUN 18 1984

862

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

First City National Bank of Bryan
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77
58-291/1131

No 01699

DATE June 12, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 4,028.65
NEW BALANCE
DEPOSIT

PAY REGISTERED ***4028 and 65 cts

TO THE ORDER OF

1785

Praxis List Company
PO Box 2352
Austin, TX 78768

COPY
NOT NEGOTIABLE

⑈001699⑈ ⑆113102316⑆ ⑈01-427⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	1813	Computer Services - Rally Cards	82008		136.95	
1	1778	List Rental - Aggies	79003		1,442.00	
	1775	Computer Services - Primary Voters	80650		436.18	
	1777	Computer Services - Aggies	79004		397.91	
	1776	Computer Services - Walk Lists	80900		103.77	
	1779	Computer Services - 6th District Favorables	80950	900	110.39	
	1811	Keypunch - Steering Committee			276.75	
	1914	Shipping - Rally Card Labels	82008		322.70	
					Total	4,028.65

DEBORAH CELLOS

JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

LOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

First City National Bank of Bryan
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 912
BRYAN, TEXAS 77...
88-231/1131

№ 01700

DATE June 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 49.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $49 and 00 cts

TO THE ORDER OF

Federal Express
PO Box 727, Dept. A
Memphis, TN 38194

1350

COPY
NOT NEGOTIABLE

⑈001700⑈ ⑆113102316⑆ ⑈001,2427⑈01

8 9 0 4 0 7 4 3 7 2 1

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 1015-1718-7 Inv. 4-136-32872 Inv. 4-132-31980	69960			49.00

DEBORAH MEL...
ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FRIENDS OF PH'L GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

First City National Bank of Bryan
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778
88-231/1131

№ 01701

DATE June 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 103.68
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $103 and 68 cts

TO THE ORDER OF

John A. Welty
1518 S. Parkwood
Harlingen, TX 78550

COPY
NOT NEGOTIABLE

⑈001701⑈ ⑆113102316⑆ ⑈0012427⑈04

8 2 0 4 0 7 4 3 7 2 2

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for newspaper ad	85600			103.68

DEBORAH MELLOD
ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

small local account. He will be phoning
[illegible] about it. We really can't be [illegible]

FRIENDS OF PHIL GRAM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91
BRYAN, TEXAS 77...
88 231/1131

№ 01702

DATE June 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 3.24
NEW BALANCE
DEPOSIT

PAY REGISTERED RB-19134 $3 and 24 cts

TO THE ORDER OF

Capitol Hill Club
300 First Street, S.E.
Washington, DC 20003

COPY
NOT NEGOTIABLE

⑈001702⑈ ⑆113102316⑆ ⑈0002427⑈01

8 9 0 4 0 7 4 3 7 2 3

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Service Charge - club member MC7949				3.24
		From charge prior to primary 78990				

DEBORAH M
ENTERED
JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 918
BRYAN, TEXAS 77
88-231/1131

№ 01703

DATE June 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 100.80
NEW BALANCE
DEPOSIT

PAY REGISTERED RB-19124 $100 and 80 cts

TO THE ORDER OF

The Corsicana Sun
PO Box 622
Corsicana, TX 75110

COPY
NOT NEGOTIABLE

⑈001703⑈ ⑆113102316⑆ ⑈0043427⑈01

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	040432	Account 016570 - Newspaper ad	85600			100.80

DEDCRAM MI...
ENTERED

JUN 18 1984

LOHA FORM 91-073-2T

ASSIFIED VOLUNTARY COMMERCIAL 6) SHOPPER 7) COMMERCIAL PRINTING 8) TV GUIDE 9) PRINTOUT

MS: DUE UPON RECEIPT

PAY THIS AMOUNT 100.80

3304074372 4

First City National Bank of Bryan

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88-231/1131

№ 01704

DATE June 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 68.37
NEW BALANCE
DEPOSIT

PAY REGISTERED ~~RD 19124~~ $68 and 37 cts

TO THE ORDER OF

Dallas Helium Balloon 1300
PO Box 20972
Dallas, TX 75220

COPY
NOT NEGOTIABLE

⑈001704⑈ ⑆113102316⑆ ⑈0042727⑈01

8 2 0 4 0 7 4 3 7 2 5

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Decorations for 5/4 rally - DFW Amfac Hotel	82008			68.37

JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

Date 1984 Amount paid

First City National Bank of Bryan
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 919
BRYAN, TEXAS 77...
08 231/1131

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

No 01705

DATE June 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 260.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-18124 $260 and 00 cts

TO THE ORDER OF

Bonneville Satellite Corporation
Accounts Receivable Department
165 Social Hall Avenue
Salt Lake City, Utahj 84111

COPY
NOT NEGOTIABLE

⑈001705⑈ ⑆113102316⑆ ⑈00[illegible]⑈01

8904074372 6

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	31-1689-84	Satellite transmission svc. 5/1/84	88400			260.00

JUN 18 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

First City National Bank of Bryan
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77[illegible]
88 231/1131

No 01706

DATE June 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 968.84
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $968 and 84 cts

TO THE ORDER OF
Espinoza Printing
1815 Young Street
Dallas, TX 75201

1340

COPY
NOT NEGOTIABLE

⑈001706⑈ ⑆113102316⑆ [illegible]

REMITTANCE ADVICE PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	9381	Printing - Dinner programs				774.12
		Envelopes	73308			89.04
		Reply cards				135.68

JUN 1 8 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

or

6

OHA FORM 91-873-2T

Date 1984 Amount paid 968.84

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

First City National Bank of Bryan
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778
68 231/1131

No 01707

DATE June 14, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 16,436.94
NEW BALANCE
DEPOSIT

PAY REGISTERED AD-19324 $16436 and 94cts

TO THE ORDER OF

Dependable Printing
707 Montgomery Street
Alexandria, VA 22314

1310

COPY
NOT NEGOTIABLE

⑈001707⑈ ⑆113102316⑆ ⑈0042427⑈01

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	05170	Printing - Fundraising letters	79006			16,436.94
	05169	Various jobs - brad O'Leary				
	05174					
	05175					
	05140					
	05186					
	05116					

DEBORAH MELLOUY
ENTERED
1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91[illegible]
BRYAN, TEXAS 77[illegible]
88-231/1131

No 01708

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 494.75
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $494 and 75 cts

TO THE ORDER OF

Bethesda Engravers
5801 Erdman Avenue
Baltimore, Maryland 21205

COPY
NOT NEGOTIABLE

⑈001708⑈ ⑆113102316⑆ ⑈0[illegible]⑈01

9 9 0 4 0 7 4 3 7 2 9

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		2500 engraved w/envelopes for thank yous				494.75
		60988				

DEBORAH [illegible]
ENTERED
JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

LOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88-231/1131

№ 01709

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 5,421.99
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $5421 and 99 cts

TO THE ORDER OF

Black, Manafort & Stone, Inc.
324 N. Alexandria Street
Alexandria, VA 22314

1122

COPY
NOT NEGOTIABLE

⑈001709⑈ ⑆113102316⑆ ⑈0042427⑈01

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	84-04-20	April statement					5,421.99
		Fee	5,000.00	51350			
		Telephone	346.59	51380			
		Shipping	75.40	51384			

ENTERED

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

ORIGINAL

⑈000049429⑈ ⑈0000320478⑈

8904074373 0

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
US 231/1131

№ 01710

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1,491.73
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $1491 and 73 cts

TO THE ORDER OF

Dependable Printing, Inc.
707 Montgomery Street
Alexandria, VA 22314

1310

COPY
NOT NEGOTIABLE

⑈001710⑈ ⑆113102316⑆ ⑈00[illegible]27⑈01

9 9 0 4 0 7 4 3 7 3

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	05237	Senategramm printing	79006			1,491.73

DEC 1 0 1984
ENTERED

JUL 1 0 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

14

LOHA FORM 91-873-2T

			DRILL	3 HOLD	
CUT			STAPLE	CORNER	SADDLE
FOLD	TEXT IN	TEXT OUT	PERFORATE		
PAD	50's	100's	NUMBER		
COLLATE			GBC BIND		

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 513
BRYAN, TEXAS 778
88-291/1131

No 01711

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK .19
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-18124 $89and19cts

TO THE ORDER OF

1303

Dallas Power & Light
Box 380100
Duncanville, TX 75138

COPY
NOT NEGOTIABLE

⑈001711⑈ ⑆113102316⑆ [illegible]⑈01

8904074373

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		A/C 151 1711 6180 0 - S. Dallas County phone bank utility	92295			89.19

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ORM 91-873-2T

FRIENDS OF PHIL GRAM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778..
88-231/1131

№ 01712

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 6,230.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $6230 and 00 cts

TO THE ORDER OF

Hobbs Bonded Fibers 1468
PO Box 151
Groesbeck, TX 76642

COPY
NOT NEGOTIABLE

⑈001712⑈ ⑆113102316⑆ ⑈0[illegible]427⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	7006	Airplane charter - April 28 - May 4, 1984				6,230.00
		54780				
				JUL 10 1984		

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

JN-
2,

ALOHA FORM 91-873-2T

AIRCRAFT I.D. #N-270M
ABOVE FOR MAY 3, 1984

TOTAL

THIS AMOUNT MAY BE DEDUCTED IF PAID BY

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77...
88-291/1131

No 01713

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1,242.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $1242 and 00 cts

TO THE ORDER OF

I Love America Committee
PO Box 1776
Lynchburg, VA 24505

-0-

COPY
NOT NEGOTIABLE

⑈001713⑈ ⑆113102316⑆ ⑈0042127⑈01

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		April 17 - mailing 15,529 pieces Jerry Falwell letter	79005			1,242.00

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

GYG/eam

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 917
BRYAN, TEXAS 77
88-231/1131

№ 01714

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 546.95
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $546 and 95 cts

TO THE ORDER OF

Thomas J. Lankford, Inc. 1549
PO Box 1504
Washington, DC 20013-1504

COPY
NOT NEGOTIABLE

⑈001714⑈ ⑆113102316⑆ 0042427⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	5766	Copying & printing - DC office	69970			546.95

DESCRIBED
ENTERED

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

HA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778[illegible]
88-231/1131

№ 01715

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 5,612.35
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $5612 and 35 cts

TO THE ORDER OF

Market Opinion Research 1595
550 Washington Blvd.
Detroit, Michigan 48226

COPY
NOT NEGOTIABLE

⑈001715⑈ ⑆113102316⑆ ⑈00[illegible]427⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	11159	Airfare - Dot McCalpin	389.00	56410			
	11194	GOTV & VNL lists	1,376.28	90030			
	11273	Volunteer work sheets	1,681.79	90030			
	11271	Postage	861.20	90000			
	11272	Federal Express	1,304.08	90000			
							5,612.35

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF [illegible], INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
58-231/1131

No 01716

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 6,890.37
NEW BALANCE
DEPOSIT

PAY REGISTERED 6890 and 37 CTS

TO THE ORDER OF

Miller, Canfield, Paddock & Stone 1620
2500 Comerica Building
Detroit, Michigan 48226

COPY
NOT NEGOTIABLE

"001716" "113102318" [illegible]01

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Legal services - April 1984 Galliano matter 6,275.37 Miscellaneous 614.50	6993			6,890.37

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778[illegible]
58-231/1131

No 01717

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 156.32
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $156 and 32 Cts

TO THE ORDER OF

Loy R. Norris 1683
245 S. W. Dian
Burleson, TX 76028

COPY
NOT NEGOTIABLE

"001717" "[illegible]" "[illegible]"

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Expense Report reimbursement				156.32
		Meals [illegible]	57070			
		Lodging 125.28	57060			

JUL 0 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

tainment	Date	Name of Person(s) & Expertise	Where Entertained	Purpose	Cost

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88-231/1131

No 01718

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 497.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $497 and 00 cts

TO THE ORDER OF

The Oak Cliff Tribune
PO Box 24363
Dallas, TX 75224

-0-

COPY
NOT NEGOTIABLE

⑈001718⑈ ⑆113102318⑆ [illegible]⑈01

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	6053	May 1/3 - newspaper ad	85600			497.00

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P O. Drawer 913
BRYAN, TEXAS 77805
BB-231/1131

No 01719

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 15,412.05
NEW BALANCE
DEPOSIT

REGISTERED RD-19124 $15412 and 05 cts

PAY

TO THE ORDER OF

Karl Rove & Company
PO Box 1902
Austin, TX 78767

1860

COPY
NOT NEGOTIABLE

⑈001719⑈ ⑆113102316⑆ ⑈001,[illegible]27⑈01

90040743740

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	1623	Balance - GOTV to undecideus	90040			15,412.05

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ance

OHA FORM 91-873-2T

#6 3/4 Business Reply Envelopes (191,000) 2,328.29

Comparison Insert (176,000) 4,942.95

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778[illegible]
88-231/1131

No 01720

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1,954.65
NEW BALANCE
DEPOSIT

PAY REGISTERED 1954 and 65 cts

TO THE ORDER OF

Waller Insurance Agency
2355 Stemmons
Dallas, TX 75207

1980

COPY
NOT NEGOTIABLE

⑈001720⑈ ⑆113102316⑆ ⑈0[illegible]427⑈01

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	1013	Tri-State O3CS 5985 - liability adding phone bank locations	67035			1,954.65

10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

F F
TX

HA FORM 91-873-2T

7. 1111-A WEST WALL STREET
MIDLAND, TX

ENDS OF PHIL GRAMM
WASHINGTON D C CORPORATION
P.O. DRAWER AO
LLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
86 231/1131

№ 01721

REGISTERED RD-19124 $875 and 62 cts

AY

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 875.62
NEW BALANCE
DEPOSIT

TO THE ORDER OF

John Weaver 1995
216 W. 26th Street
Bryan, TX 77801

COPY
NOT NEGOTIABLE

⑈001721⑈ ⑆113102316⑆ ⑈0[illegible]⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT		ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Expense Reports for victory party and travel for delivering newspaper copy					875.62
		victory party	180.44	82008			
		travel	522.24	58990			
		advertising	40.00	85600			
		entertainment	47.03	58940			
		shipping	50.59	58984			
		miscellaneous	35.32	58900			

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

10 rcu

CAMPAIGN MILEAGE

Bryan to Hillsboro to
Cleburne to Granbury to

PURPOSE

Delivery of campaign
advertising to [illegible]

→ 545.48

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778
58 231/1131

No 01722

DATE June 26, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1696.59
NEW BALANCE
DEPOSIT

PAY REGISTERED $1696and59cts

TO THE ORDER OF

Lanny F. Wiles
140 W. Monroe Street, Suite 60
Jacksonville, Florida 32202

COPY
NOT NEGOTIABLE

⑈001722⑈ ⑆113102316⑆

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse expenses - victory party	$2008			1,696.59

JUL 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

Charlie, I hope this will fit all budgets. Look forward to talking to you after the Presidents trip to Ireland. Susie and I will be available to conduct scheduling and advance seminars for any of your clients if you would like.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
68-291/1131

No 01723

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 300.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-15124 $300 and 00 cts

TO THE ORDER OF

Pete Rodriguez -O-
2911 Woodmeadow
Bryan, TX 77802

COPY
NOT NEGOTIABLE

"001723" "113102316"

8900407437744

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		music for victory party	82008			300.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 81-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88-231/1131

No 01724

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 22.50
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $22 and 50 Cts

TO THE ORDER OF

South/West Printing -0-
603 Sulphur Springs Road
Bryan, TX 77801

COPY
NOT NEGOTIABLE

⑈001724⑈ ⑆113102316⑆ [illegible]

8900407437 45

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	15087	Copies - Bryan office	58900			22.50

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

LOMA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC
P.O. Drawer 913
BRYAN, TEXAS 77...
68-231/1131

No 01725

DATE June 22, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 130.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $130 and 00 cts

TO THE ORDER OF

Road Runner Productions -0-
2109 Willhelm
Bryan, Texas 77803

COPY
NOT NEGOTIABLE

⑈001725⑈ ⑆113102316⑆ ⑈0...27⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Sound System for victory party	82008			130.00

DEGO... INTERED
JUL 1 6 1...

ATTACHED CHECK IS PAYMENT OF THE ITEM LISTED ABOVE.

91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

First City National Bank of Bryan
FIRST CITY BANCORPORATION OF TEXAS INC.
P.O. Drawer 913
BRYAN, TEXAS 77
88 231/1131

No 01727

DATE June 26, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 1,918.04
NEW BALANCE
DEPOSIT

PAY REGISTERED ~~RD-1912~~ $1918 and 04 cts

TO THE ORDER OF Friends of Phil Gramm

COPY
NOT NEGOTIABLE

⑈001727⑈ ⑆113102316⑆ 00[illegible]⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for first half of May 1984 payroll taxes paid from General Account in error				1,918.04
		FICA employee	413.17	21011		
		FICA employer	431.67	21012		
		FIT	1,073.20	21013		

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PH'L GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91[illegible] AT
BRYAN, TEXAS 77[illegible]
68-231/1131

№ 01728

DATE June 26, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 73.77
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19224 $73 and 77 CTS

TO THE ORDER OF

Southwestern Bell Tele. Co. $ -0-
Po Box 90
San Antonio, TX 78287

COPY
NOT NEGOTIABLE

⑈001728⑈ ⑆113102318⑆ [illegible]

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		806/795-7270 - final bill - Lubbock phone ban[illegible]	98030			73.77

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 513
BRYAN, TEXAS 77805
08 231/1131

No 01729

DATE June 29, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 175.42
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $175 and 42 cts

TO THE ORDER OF

Communication Specialists, Inc. 1255
One Red River
PO Box 1529
Austin, TX 78767

COPY
NOT NEGOTIABLE

⑈001729⑈ ⑆113102316⑆ ⑈001729⑈01

8 9 0 4 0 7 4 3 7 4 9

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Credit due from 3/31/84		(295.81)		
	73771-15	Mag Tapes - $500+ line listing	79005	471.23		175.42

JUL 10 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

Campack #35

A/C 41 864 09 000

American Security Bank
635 Mass Ave NW
Washington DC 20001

Balance on May Invoice $24,189.42

DEBORAH MELLODY
ENTERED

JUN 18 1984

Elaine 6/12/84

Printing	79006	~~[illegible]~~ 2325.02
Mail Svc/Hand	79005	12,720.06
Courier	~~79002~~ 60980	2642.50
Programming	79001	722.51
Air Mail	60992	4835.10
Record Maint	60998	944.23

,170

8904074375 0

Wire #34

Campack Systems

A/C 41-864-09-000

1170 American Security Bank
635 Mass Ave NW
Washington DC 20001

$10,000.00

payment on A/C

79006

Called
Elaine
6/8/84

DEBORAH MELLO...
ENTER...

JUN 18 1984

8 2 0 4 0 7 4 3 7 5 1

R 9 0 4 0 7 4 3 7 5 2

2214

June 4 19 84

1400

To General Telephone Co. of the S.W.
P. O. Box 2933, Austin 78769-2933

For Campaign Telephone charges on phone in Bryan office

64980

DEPOSITS	total		
	this check	274	84
	balance		

DEBORAH MELLODY
ENTERED

0 4 0 7 4 3 7 5 3

1060

Airfare
4710 734.78
4760 - 403.00
Lodging

2215

June 4 19 84

To American Express (3782-642403-11007)

all for PG

5/2 H. Johnson Amarillo	128.70		
5/4 Ramada - College St.	110.97		
4/24 H. Johnson-Texarkana	89.88		
4/18 Holiday Inn. SanAng.	112.84		
4/15 H. Johnson Texarkana	93.09		
4/7 Hyatt - Dallas	145.80	1,137	78
4/16 Brazosport Hilton (L. Jackson)	53.50		
4/5 N/W Airline Wash/dFW	234.00		
4/4 Delta Dallas-Balt.	169.00		

DEPOSITS

total

this check

balance

DEBORA[illegible]

8 9 0 4 7 4 3 7 5 4

1060

Surface
54710

2216

June 4 19 84

To American Express (2720-341405-01007)

4/29 Mrs. Lee Wash/Houston/ ~~& return~~	300		
4/29 Mr. Lee " "	300		
4/29 ~~Marshall & Jeff "~~	530		
4/30-5/7 R.C. & Larry) ~~(credit " ")~~	766 ~~347~~		
4/24 Wendy addition chg	94	1,643	00
	balance		

1643

DEPOSITS

DEBORAH MELLODY
ENTERED

P 1984

8 9 0 4 0 7 4 3 7 5 5

1400

69980

2218

June 6 19 84

To General Telephone Co. of the S.W.
P. O. Box 2933
Austin, TX 78769-2933

For Telephone bill on
409/779-9613

DEPOSIT		
total		
this check	82	65
balance		

1 8 1984

8 9 0 4 0 7 4 3 7 5 6

1510

54780

2221

June 21 19 84

To Mary Fae Kamm
307 S. Horn Duncanville, TX
Telephone calls made by PG

For

total		
this check	28	26
balance		

DEPOSITS

JUL 1 0 1984

8 2 0 4 0 7 4 3 7 5 7

JUL 10 1984

2222

June 21 1984

C&P Telephone
~~930 H St., N.W.~~
Washington, D.C. 20001

Campaign telephone calls

For

DEPOSITS

total

this check 20 37

balance

10

64980

EXHIBIT C-3

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91
BRYAN, TEXAS 77...
98-231/1131

...IL GRAM...
...CORPORATION
...R AO
...TEXAS 77840

№ 01730

DATE 7/2/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 20,000.00
NEW BALANCE
DEPOSIT

...EGISTERED ... $20000 and 00 cts

...ting Corp. 1750

COPY
NOT NEGOTIABLE

⑈001730⑈ ⑆113102316⑆ ...01

...MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Payment on account				20,000.00
	Drink	73504 5844.95				
	Food	73503 14,155.05				

DEBORAH MELLOW
ENTERED
JUL 19 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

LOHA FORM 91-873-2T

Ex. C-3

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77...
88 231/1131

No 01731

DATE July 6, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 625.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $625 and 00 cts

TO THE ORDER OF

Michael A. Sterlacci
5105-P Backlick Road
Annandale, VA 22003

COPY
NOT NEGOTIABLE

⑈001731⑈ ⑆113102316⑆ 00...01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Legal Services - April 1984	69935			625.00

DEBORAH HELLODY
ENTERED
JUL 19 1984

,unc ... t.

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

...OHA FORM 91-873-2T

and return to Schoener's Offi... No ...

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF T[illegible], INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
68-231/1131

№ 01732

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

DATE July 6, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 3,381.23
NEW BALANCE
DEPOSIT

PAY REGISTERED $3381 and 23 cts

TO THE ORDER OF

Miller, Canfield, Paddock & Stone 1620
2500 Comerica Bldg.
Detroit, Michigan 48226

COPY
NOT NEGOTIABLE

⑈001732⑈ ⑆113102316⑆ ⑈0012427⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUN
		Legal Services - Primary				1,385.
	W-461	Gallanoo matter	69935			1,995.
	W-462	Miscellaneous matters				

ENTERED
DEBOR U. PELLOD
JUL 19 1984

ATTACHED CHEC PAYMENT OF THE LISTED ABOVE.

ALOHA FORM 91-873-2T

Jim
James F. Schoener

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 919
BRYAN, TEXAS 77
68-231/1131

No 01733

DATE July 9, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 25,000.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $25000and00cts

TO THE ORDER OF
PFM Consulting 1750

COPY
NOT NEGOTIABLE

⑈001733⑈ ⑆113102318⑆

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Payment on account				25,000.00
		Apply to fee		1350		

RECEIVED
DEBORAH KELLEY
JUL 19 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OMA FORM 91-873-2T

Lodging for Pam Gillespie/Ford Event	500.00
Federal Express	491.70
Taxi	261.30 -

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778
86 231/1131

No 01735

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. BRAWER AO
COLLEGE STATION, TEXAS 77840

DATE July 9, 1984
PREVIOUS BALANCE
THIS AMOUNT CHECK 15.65
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $16 and 65 cts

TO THE ORDER OF

Carolyn Huchton
6964 Escondido
El Paso, TX 79912

-0-

COPY
NOT NEGOTIABLE

⑈001735⑈ ⑆113102316⑆ ⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Contract labor - El Paso phone bank 91000				16.65

DEBORA PELLOUX
ENTERED
JUL 19 1984

ATTACHED CHECK IS PAYMENT OF THE ITEM LISTED ABOVE.

8 9 0 4 0 7 4 3 7 5 2

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 912
BRYAN, TEXAS 778.
88 231/1131

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

№ 01734

DATE July 9, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 80.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $80 and 00 cts

TO THE ORDER OF

Emily Kimball
7144 Dale Road
El Paso, TX 79915

COPY
NOT NEGOTIABLE

⑈001734⑈ ⑆113102316⑆ 001[illegible]27⑈01

8 9 0 4 0 7 4 3 7 5 3

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Contract labor - El Paso phone bank 91000				80.00

DEBOR U. MELLODY
ENTERED
JUL 19 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. BRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P. O. Brawer 91
BRYAN, TEXAS 7780
88-231/1131

№ 01738

DATE 7/12/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 8,238.70
NEW BALANCE
DEPOSIT

PAY REGISTERED Rs-19124 $8238 and 70 cts

TO THE ORDER OF

Karl Rove & Company 1860
PO Box 1902
Austin, TX 78767

COPY
NOT NEGOTIABLE

⑈001738⑈ ⑆113102316⑆ ⑈0012327⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	2718	Phone bank follow-up printing	90040			5,463.19
	1625	Additional Kick-off mailing	80950			2,121.30
	1720	6th District Letters	80950			654.21

DESCRIPTION OF PAYMENT
ENTERED
JUL 19 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O Drawer 912
BRYAN, TEXAS 778..
88 231/1131

No 01739

DATE 7/12/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 2,099.64
NEW BALANCE
DEPOSIT

PAY REGISTERED $2099and64cts

TO THE ORDER OF

Praxis List Company 1785
PO Box 2352
Austin, TX 78768

COPY
NOT NEGOTIABLE

⑈001739⑈ ⑆113102316⑆ 2427⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	1823	Computer Services - Favorables	90050			1,094.58
	1822	Computer Services - Hatch mailing	79004			1,005.06

DEBORAH PELLOW
INTERES

JUL 19 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

SBA FORM 81-873-2T

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778...
88-231/1131

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

№ 01740

DATE 7/12/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 8,647.32
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $8647 and 32 cts

TO THE ORDER OF

Karl Rove & Company 1860
PO Box 1902
Austin, TX 78767

COPY
NOT NEGOTIABLE

⑈001740⑈ ⑆113102316⑆ ⑈02...427⑈01

9 9 0 4 0 7 4 3 7 5 6

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	1722	Mail Service & postage for phone bank mailings	90050			8,647.32

DEBOR UNCLASSIFIED
ENTERED
JUL 19 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

k-0

LOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77[illegible]
88-231/1131

№ 01741

DATE July 16, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 16,400.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RB-13124 $16400 and 00 cts

TO THE ORDER OF

P/M Consulting Corp.
Freedom House
200 E. Street N.E.
Washington, DC 20002

1750

COPY
NOT NEGOTIABLE

⑈001741⑈ ⑆113102316⑆ [illegible]127⑈01

9 9 0 4 0 7 4 3 7 5 7

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	371	Balance due on Fee portion of invoice	57350			16,400.00

JUL 19 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778[illegible]
68 231/1131

№ 0174[illegible]

DATE 7/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 25,000.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $25000 and 00 cts

TO THE ORDER OF

P/M Consulting Corp. 1750
Freedom House
202 E Street, NE
Washington, DC 20002

COPY
NOT NEGOTIABLE

⑈001742⑈ ⑆113102316⑆ ⑈001[illegible]27⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOU[illegible]
		Payment on account - primary	57350			25,000.0[illegible]

ENTERED
DEBORAH MELLOD
AUG 3 1984

ATTACHED CHECK I[illegible]
PAYMENT OF THE IT[illegible]
LISTED ABOVE.

ALOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 7 6 8

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88 231/1131

№ 01743

DATE July 23, 1984
PREVIOUS BALANCE
AMOUNT THIS CHECK 38.32
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $38 and 32 cts

TO THE ORDER OF

Richard H. McBride 1575
P. O. Box 4
round Rock, TX 78664

COPY
NOT NEGOTIABLE

⑈001743⑈ ⑆113102316⑆ ⑈0012477⑈01

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse for phone calls made 4/24/84 - 5/5/84	56280			38.32

DEBORAH FELLOW
ENTERED
AUG 3 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

rtainment	Date	Name of Person(s) & Expertise	Where Entertained	Purpose	Cost

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778..
88.231/1131

№ 01744

DATE 7/31/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 196.67
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19184 $196 and 67 cts

TO THE ORDER OF
CN'C Photographics
3130 E. 29th, Suite A201
Bryan TX 77802

COPY
NOT NEGOTIABLE

⑈001744⑈ ⑆113102316⑆ ⑈0342427⑈01

0 4 0 7 4 3 7 7 0

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	30109	Photographic services 5/5/84	82008			196.67

DEBOR... ENTERED
AUG 3 1984

OHA FORM 91-873-2T

I claims and returned goods MUST be accompanied by this bill

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P. O. Drawer 919
BRYAN, TEXAS 77...
88-231/1131

№ 01745

DATE 7/31/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 29.38
NEW BALANCE
DEPOSIT

PAY REGISTERED RB-19124 $29 and 38 cts

TO THE ORDER OF

Nan's Blossom Shop
1105 Texas Avenue
Bryan, TX 77802

COPY
NOT NEGOTIABLE

⑈001745⑈ ⑆113102316⑆ 0...427⑈01

9 0 4 0 7 4 3 7 7 1

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Flowers - election night	82008			29.38

DEBOR... ENTERED

AUG 3 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91
BRYAN, TEXAS 77802
88-231/1131

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

№ 01746

DATE 7/31/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 40,000.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $40000 and 00 cts

TO THE ORDER OF

1750

P/M Consulting
Freedom House
202 E Street, NE
Washington, DC 20002

COPY
NOT NEGOTIABLE

⑈001746⑈ ⑆113102316⑆ ⑈0[illegible]27⑈01

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CUTTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Payment on account 57350				40,000.00

DEBOR [illegible]
ENTERED
AUG 3 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

LOHA FORM 91-873-2T

8 9 0 4 0 7 4 3 7 7 3

JUL 1 9 1984

balance

To

1756

2224

July 3 19 84

69900 To Pitney Bowes

DEPOSITS

For Tape (6 Rolls)

for Stamp

Machine

total

this check 19 80

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778..
88-231/1131

№ 01747

DATE 8/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 13.09
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $13 and 09 cts

TO THE ORDER OF

Aaron Rents 1004
4312 McEwen Road
Dallas, TX 75234

COPY
NOT NEGOTIABLE

⑈001747⑈ ⑆113102316⑆ ⑈0042427⑈01

9 0 0 4 0 7 4 3 7 7 4

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		6% sales tax on attached invoice copies not previously charged or paid	91430			13.09

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

knowledgement of goods received or
ervices performed
ount approved for payment

8 1984

Account number
Date paid 4-2-84
Check number 1321
Amount paid 49 [illegible]

FRIENDS OF PHIL GRAM'
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91[illegible]
BRYAN, TEXAS 773[illegible]
86 231/1131

№ 01748

DATE 8/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 37.68
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $37 and 68 cts

TO THE ORDER OF

American Business Telephone Systems, Inc. 1055
3330 Keller Springs, Suite 245
Carrollton, TX 75006

COPY
NOT NEGOTIABLE

⑈001748⑈ ⑆113102316⑆ ⑈03[illegible]⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		6% sales tax on materials - Inv. 5553 - not previously charged or paid	63055			37.68

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

LOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778..
88 231/1131

№ 01749

DATE 8/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 9.53
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $9 and 53 cts

TO THE ORDER OF

Coca-Cola
PO Box 2008
Dallas, TX 75221

1250

COPY
NOT NEGOTIABLE

⑈001749⑈ ⑆113102316⑆ ⑈0742427⑈01

0 2 0 4 0 7 4 3 7 7 5

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		5% sales tax no previously charged or paid Seed attached cash ticket copies	63075			9.53

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

T5

OHA FORM 91-873-2T

EMPTY CTN. CASES RET.
EMPTY BOTTLES RET.

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 912
BRYAN, TEXAS 77[illegible]
68-231/1131

№ 01750

DATE 4/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 66.26
NEW BALANCE
DEPOSIT

PAY REGISTERED $66 and 26 cts

TO THE ORDER OF

Edwards Sign Company
111 S. Broad
Mesquite, TX 75149

COPY
NOT NEGOTIABLE

⑈001750⑈ ⑆113102316⑆ ⑈0[illegible]427⑈01

8 9 0 4 0 7 4 3 7 7 7

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		5% sales tax - Inv. dated 4/2/84 not previously charged or paid	63000			66.26

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778
88-231/1131

№ 01751

DATE 8/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 34.20
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $34 and 20 cts

TO THE ORDER OF

Holden Business Machines, Inc. 1470
7108 Military Parkway
Dallas, TX 75227

COPY
NOT NEGOTIABLE

⑈001751⑈ ⑆113102316⑆ ⑈0042977⑈01

0 0 4 0 7 4 3 7 7 8

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		6% sales tax not previously charged or paid See attached invoice copies	63085			34.20

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

GHA FORM 91-873-2T

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88-231/1131

№ 01752

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

DATE 8/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 34.85
NEW BALANCE
DEPOSIT

PAY REGISTERED $34 and 85 cts

TO THE ORDER OF

Monroe Systems for Business 1655
Box 9000R
Morristown, NJ 07960

COPY
NOT NEGOTIABLE

⑈001752⑈ ⑆113102316⑆ ⑈00[illegible]127⑈01

8904074377 9

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		6% sales tax not previously charged or paid See attached invoice copies				34.85
		63015 Dal 65015 Hou	7.05 27.80			

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O Drawer 913
BRYAN, TEXAS 778[illegible]
88-231/1131

№ 01753

DATE 8/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 52.61
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $52 and 61 cts

TO THE ORDER OF

Maple Office Supply 1590
5353 Maple, Suite 100
Dallas, TX 75235

COPY
NOT NEGOTIABLE

⑈001753⑈ ⑆113102316⑆ [illegible]⑈01

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		6% sales tax not previously charged or paid See attached invoice copies	63050			52.61

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

5
8-

OHA FORM 91-873-2T

407 102.84

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77806
88-231/1131

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

№ 01754

DATE 8/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 16.74
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $16 and 74 cts

TO THE ORDER OF

Phoenix Screen Printing
2356 Irving Blvd.
Dallas, TX 75207

COPY
NOT NEGOTIABLE

⑈001754⑈ ⑆113102318⑆ ⑈0042427⑈01

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	290	6% sales tax not previously charged or paid	80300			16.74

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88-231/1131

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

No 01755

DATE 6/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 9.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $9 and 00 cts

TO THE ORDER OF

Union Station
400 S. Houston
Dallas, TX 75202

COPY
NOT NEGOTIABLE

⑈001755⑈ ⑆113102316⑆ ⑈0[illegible]427⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		6% sales tax on food not previously charged or paid - See attached copies	82006			9.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
58-231/1131

No 01756

DATE 1/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 12.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $12 and 00 cts

TO THE ORDER OF

Universal Signs
411 N. Interurban
Richardson, TX 75081

COPY
NOT NEGOTIABLE

⑈001756⑈ ⑆113102316⑆ ⑈004427⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	11105	6% sales tax not previously paid	80600			12.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

NOTICE: THIS INVOICE IS DUE AND PAYABLE IN FULL UPON RECEIPT

SUB-TOTAL

FRIENDS OF PHIL GRAM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 7784

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 7780.
88-231/1131

№ 01757

DATE 8/20/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 16.14
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 16 and 14 cts

TO THE ORDER OF

Vanier Grapnics
PO Box 370
Santee, Calif. 92071

COPY
NOT NEGOTIABLE

⑈001757⑈ ⑆113102316⑆ ⑈0062427⑈01

8 0 4 0 7 4 3 7 8 4

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	309337	6% sales tax not previously charged or paid	69970			16.14

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778..
88-231/1131

№ 01758

DATE 6/26/89
PREVIOUS BALANCE
AMOUNT THIS CHECK 1,348.31
NEW BALANCE
DEPOSIT

PAY REGISTERED $1348and31Cts

TO THE ORDER OF

Aggieland Hotel
1502 S. Texas Avenue
College Station, TX 77840

COPY
NOT NEGOTIABLE

⑈001758⑈ ⑆113102316⑆

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Victory Party	82008			1,348.31

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

JHA FORM 61-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77[illegible]
88-231/1131

№ 01759

DATE [illegible]
PREVIOUS BALANCE
AMOUNT THIS CHECK 5,539.17
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $5539 and 17 cts

TO THE ORDER OF

Communication Specialists, Inc. 1255
One Red River
PO Box 1529
Austin, TX 78767

COPY
NOT NEGOTIABLE

⑈001759⑈ ⑆113102316⑆ ⑈000[illegible]⑈01

8904074378 6

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	7491824	Primary File Updates	79004			5,539.17

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAM...
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 91...
BRYAN, TEXAS 77801
88-231/1131

№ 01760

DATE 8/20/...
PREVIOUS BALANCE
AMOUNT THIS CHECK 556.91
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-18124 $556 and 91 cts

TO THE ORDER OF

Dr. Luis Rios
Route 1, Box 585
McAllen, TX 78504

COPY
NOT NEGOTIABLE

⑈001760⑈ ⑆113102315⑈ ⑈001 127⑈01

8 3 0 4 0 7 4 7 8 7

ITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Reimburse expenses - Hidalgo County primary				556.91
		Phone Bank - 88.66 Ads - 323.32 Press Conference - 63.55 Misc. - 61.98 Reception - 19.40	98000			

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 778
[illegible]

No 01761

DATE 6/22/04
PREVIOUS BALANCE
AMOUNT THIS CHECK 25,000.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $25000and00cts

TO THE ORDER OF

P/M Consulting 1750
Freedom House
202 E Street, NE
Washington, DC 20002

COPY
NOT NEGOTIABLE

[illegible]

8900407437888

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Payment on account	51350			25,000.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEM LISTED ABOVE.

0· T

[redacted]

EXHIBIT C-4

30000·00 +
61·35 +
366·21 +
31700·00 +
18267·13 +
226·35 +
750·00 +
199·24 +
81570·28 T

Prior Exp. paid

13·[illegible]

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77805
88-231/1131

№ 01762

DATE 4/4/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 30,000.00
NEW BALANCE
DEPOSIT

PAY REGISTERED $30000 and 00 cts

TO THE ORDER OF

P/M Consulting 1750
Freedom House
202 E Street, N.E.
Washington, DC 20002

COPY
NOT NEGOTIABLE

⑈001762⑈ ⑆113102316⑆ ⑈074[illegible]⑈01

9 0 4 0 7 4 3 7 8 9

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Payment on account	57350			30,000.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

IA FORM 91-873-2T

Ex C-4

ENDS OF PHIL GRAMM
WASHINGTON D C CORPORATION
P.O. DRAWER AO
GE STATION. TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P. O. Drawer 913
BRYAN TEXAS 77801
88-231/1131

№ 01763

REGISTERED RD-19124 $61 and 35 cts

DATE 9/27/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 61.35
NEW BALANCE
DEPOSIT

ransworld Systems, Inc.
430 Empire Central, Suite 460
allas, TX 75247

COPY
NOT NEGOTIABLE

⑈001763⑈ ⑆113102316⑆ ⑈0[illegible]127⑈01

CE - PLEASE DETACH BEFORE DEPOSITING CHECK

INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	El Paso Marriott AC 77731-000-0006909697 Press Conf. 12/15/83	82006			61.35
				3 1984	

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88-231/1131

№ 01764

DATE 9/27/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 366.21
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $366 and 21 cts

TO THE ORDER OF

Lawrence a. Neal
5555 N. Lamar, Suite J113
Austin, TX 78751

1678

COPY
NOT NEGOTIABLE

⑈001764⑈ ⑆113102316⑆ ⑈00[illegible]427⑈01

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Expense Report 5/5/84				366.21
		Meals	9.24	56870		
		Lodging	311.04	56860		
		Telephone	45.93	56880		
					OCT [illegible]	

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

HA FORM 91-873-2T

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
88-231/1131

FRIENDS OF PHIL GRAMM
A WASHINGTON D C CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

№ 01765

DATE 9/25/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 33,000.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $33000 and 00 cts

TO THE ORDER OF

P/M Consulting
Freedom House
202 E Street, NW
Washington, DC 20002

1750

COPY
NOT NEGOTIABLE

⑈001765⑈ ⑆113102316⑆ ⑈0[illegible]427⑈01

8904074379 2

EMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Payment on account	57350			~~33,000.00~~
					G	1300.00
				OCT	property	31,700

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
68-231/1131

№ 01766

DATE 10/3/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 18,267.13
NEW BALANCE
DEPOSIT

REGISTERED RD-19124 $18267 and 13cts

PAY

TO THE ORDER OF

Campaign Systems
300 Sewell Court
Irving, TX 75038

COPY
NOT NEGOTIABLE

⑈001766⑈ ⑆113102316⑆ ⑈001 437⑈01

9 9 0 4 0 7 4 3 7 9 3

MITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
	82184	Phone lists, GOTV sheets for Primary				18,267.13

90020

OCT 12 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

OHA FORM 91-873-2T

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. BRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Brawer 913
BRYAN, TEXAS 77801
88-231/1131

№ 0176

DATE 10/11/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 226.35
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-18124 $226 and 35 cts

TO THE ORDER OF

Friends of Phil Gramm

COPY
NOT NEGOTIABLE

⑈001767⑈ ⑆113102315⑆ ⑈0[illegible]427⑈01

REMITTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Transfer balance in Telephone Deposit Account to General				226.35

ENTERED

OCT 12 1984

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ALOHA FORM 91-873-2T

Payable to Friends of Phil Gramm $ 226.35

Address

Explanation
tfr. bal in Telephone deposit
A/C

Charge

Department Gramm By DM Approved JB

FRIENDS OF PHIL GRAMM
A WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
US 291/1131

№ 01768

DATE 10/17/84
PREVIOUS BALANCE
AMOUNT THIS CHECK 750.00
NEW BALANCE
DEPOSIT

PAY REGISTERED RD-19124 $750 and 00 cts

TO THE ORDER OF

Michael A. Steriacci
5105-P Backlick Road
Annandale, VA 22003

COPY
NOT NEGOTIABLE

⑈001768⑈ ⑆113102316⑆ ⑈0042427⑈01

ANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

ATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Legal fees - Galliano matter	69935			750.00

ATTACHED CHECK IS IN PAYMENT OF THE ITEMS LISTED ABOVE.

ECO'

FIRST CITY NATIONAL BANK OF BRYAN
FIRST CITY BANCORPORATION OF TEXAS, INC.
P.O. Drawer 913
BRYAN, TEXAS 77801
US-231/1131

№ 01769

RIENDS OF PHIL GRAMM
WASHINGTON D.C. CORPORATION
P.O. DRAWER AO
COLLEGE STATION, TEXAS 77840

DATE 10/17/84
PREVIOUS BALANCE
THIS AMOUNT CHECK 199.24
NEW BALANCE
DEPOSIT

REGISTERED NO-19124 $199 and 24 cts

THE ORDER

Farmers Market Bar-B-Que
2700 Texas Avenue
Bryan, TX 77801

COPY
NOT NEGOTIABLE

⑈001769⑈ ⑆113102316⑆ ⑈0042927⑈01

ATTACHED CHECK IS PAYMENT OF THE ITEM LISTED ABOVE.

ATTANCE ADVICE - PLEASE DETACH BEFORE DEPOSITING CHECK

DATE	INVOICE NUMBER	DESCRIPTION OF PAYMENT	ACCT. NO.	GROSS AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Victory party food	82008			199.24

7.41
199.24

EXHIBIT C-5

Phil Gramm
peake Street, NW
, DC 20016

DETROIT, MICHIGAN 48226

November 7, 1984

W-496
JFS 215

TO MILLER, CANFIELD, PADDOCK AND STONE DR

2500 COMERICA BUILDING

Re: Galliano Matter

IDENTIFICATION NO. 38-0826500

ING BALANCE (Inv. W-480)	8,156	63
DISBURSEMENTS (from Sept., 1984)	12	19
TOTAL AMOUNT DUE:	8,168	82

PLEASE REFER TO INVOICE NO. W-496
WHEN YOUR PAYMENT IS ISSUED. THANK YOU.

12/6/84

PRIMARY BILLS
UNPAID 12/6/84

8900407437797

EX C-5

IN ACCOUNT WITH
[illegible]MAN, HOWELL, SMITH & LEE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
P.O. BOX 1470 WACO, TEXAS 76703
817 754-1421

Friends of Phil Gramm
2451 Stemmons Freeway
Dallas, Texas 75207

DATE October 10, 1984

S. NO. 74-2004800

For SERVICES RENDERED in connection with the Friends of Phil Gramm Appreciation Dinner in Waco on October 9, 1984 including services of Marjory Leavell and secretaries.		$2,700.00	
For EXPENSES:			
Long Distance	42.25		
Photostats	112.75		
Telecopy	8.00		
Stamps	281.06 - 290.00		
Postage	25.40		
Pianist	75.00	544.46	
TOTAL SERVICES RENDERED AND EXPENSES			$3,244.46

9 Fred

9/h
10/24/84

10/17

8 9 0 4 0 7 4 3 7 9 8

CLIENT NO. 12039
MATTER NO. 0117
BILLING ATTY 006-JRL/dh

KARL ROVE+COMPANY

Direct
Marketing
Consultants

P.O. Box 1902
Austin, Texas 78767

512 479-6601

Invoice

Invoice No: #2055

Date: October 15, 1984

To: Phil Gramm for Senate
5555 N. Lamar Blvd.
Suite J-113
Austin, Texas 78751

Computer Services	
April 1984 - 648 Printout of List Codes	$ 30.00
(IRIX + 1A3X) Set-up Fee	5.00
Print-out fee	
TOTAL	$ 35.00

Balance due within 10 days from date of Invoice

THANK YOU

8904074379

Please make your check payable "Karl Rove + Company"

Balance due within 30 days from date of invoice.

P/M Consulting Corporation
Bradley S. O'Leary
President

Invoice # 391

August 7, 1984

TO: Friends of Phil Gramm
ATTN: Richard McBride
5555 North Lamar
Austin, Texas 78751

Fundraising fee for Primary	20,000.00
Airfare expense for Primary	
Brad O'Leary:	
2 Round trips, June, DC/TX	1,300.00
2 Round trips, July, DC/TX	1,300.00
2 Round trips, August, DC/TX	1,300.00
Donna Makris:	
1 Round trip, June, DC/TX	650.00
1 Round trip, July, DC/TX	650.00
List rental	6,300.00
TOTAL	~~31,500.00~~ — 9/30

$1,300
Paid 10/84
39,200.00 10/17

8/23/84

8204074380

Friends of Phil Gramm
4406 Chesapeake Street, NW
Washington, DC 20016

DETROIT, MICHIGAN 48226

October 10, 1984

W-480
JFS 215

TO MILLER, CANFIELD, PADDOCK AND STONE DR

2800 COMERICA BUILDING

35677-0002

IDENTIFICATION NO. 38-0886800

OUTSTANDING BALANCE (Inv. W-472)	~~7,318~~	~~13~~
Fees for professional services rendered on behalf of Friends of Phil Gramm with respect to the Galliano court case, from July 27, up to and including August 21, 1984.	820	00
Disbursements (8-23-84)	18	50
Total Amount Due:	~~8,138~~	~~63~~
	838	50

PLEASE REFER TO INVOICE W-480 WHEN PAYMENT IS ISSUED. THANK YOU.

JFW
10/11/84

8320407438201

Friends of Phil Gramm
4406 Chesapeake Street, N.W.
Washington, DC 20016

8/20/84

DETROIT, MICHIGAN 48226

August 15, 1984

W-472
JFS 215

TO MILLER, CANFIELD, PADDOCK AND STONE DE

2500 COMERICA BUILDING
Detroit, MI 48226

35677-0002

IDENTIFICATION NO. 38-0886500

Fees for professional services rendered on behalf of Friends of Phil Gramm with respect to the Galliano court case, from June 14, up to and including July 26, 1984. (see attached billing report)		7,190	00
Disbursements		128	13
Total Amount Due:		7,318	13

PLEASE REFER TO INVOICE NO. W-472
WHEN PAYMENT IS ISSUED. THANK YOU.

10/17 8
9/30

4

8 9 0 4 0 7 4 3 8 0 2

Invoice
#2639

Invoice

Invoice

Invoice

Invoice

Invoice

Invoice

Invoice

Invoice

Invoice

Invoice

Invoice

Invoice

CAMPAC PUBLICATIONS

Serving the Political Community
210 7th Street, S.E. Suite C25
Washington, D.C. 20003
Telephone (202) 638-4469

May 23, 1984

Friends of Phil Gramm
P/M Consulting
202 E Street, NE
Washington, D.C. 20002

Keypunching of names supplied by Texas Secretary of State's office. Delivered to P/M Consulting April 24th.

71,516 names keyed and verified @$.09 per	$6436.44
Total due	$6436.44

GH
11/8/84

6/30
10/17 &
9/30

8 9 0 4 0 7 4 3 8 0 3

Invoice

2646

Invoice

Invoice

Invoice

Invoice

Invoice

Invoice

Invoice

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Invoice

Invoice

Invoice

Invoice

Invoice

Invoice

CAMPAC PUBLICATIONS

Serving the Political Community
210 7th Street, S.E. Suite C25
Washington, D.C. 20003
Telephone (202) 638-4469

May 23, 1984

Friends of Phil Gramm
c/o P/M Consulting
202 E Street, NE
Washington, D.C. 20002

Telephone look-ups of major donors on lists supplied by P/M for Gramm campaign (primary)

13,416 names @ $.20 per	$2683.20
Total due	$2683.20

OK 11/6/84

6/30
9/30
10/17

[redacted]

EXHIBIT D-1

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(Summary Page)

ALIGN AREA | ALIGN AREA

EX. D-1

1. Name of Committee (in Full): FRIENDS OF PHIL GRAMM

2. FEC Identification Number: C00170712

Address (Number and Street): 2355 Stemmons Freeway, Suite 503

3. Is this Report an Amendment? [X] YES [ ] NO

City, State and Zip Code: Dallas, TX 75205

[X] Check if address is different than previously reported.

4. TYPE OF REPORT

- [ ] April 15 Quarterly Report
- [X] July 15 Quarterly Report
- [ ] October 15 Quarterly Report
- [ ] January 31 Year End Report
- [ ] July 31 Mid Year Report (Non-election Year Only)
- [ ] 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

This report contains activity for — [X] Primary Election [X] General Election [ ] Special Election [ ] Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period April 16, 1984 through June 30, 1984		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	1,427,492.52	2,257,126.67
(b) Total Contribution Refunds (from Line 20 (d))	765.00	1,050.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	1,426,727.52	2,256,076.67
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	1,608,310.81	3,434,055.11
(b) Total Offsets to Operating Expenditures (from Line 14)	11,017.27	11,017.27
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	1,597,293.54	3,423,037.84
8. Cash on Hand at Close of Reporting Period (from Line 27)	39,259.43	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	0.00	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	389,452.25	

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

JOHN P. BAXTER
Type or Print Name of Treasurer

John P. Baxter
SIGNATURE OF TREASURER

12/14/84
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 3 (3/80)

8 9 0 4 0 7 4 3 8 0 5

EXHIBIT D-1

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(Summary Page)

ALIGN AREA

1. Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

2. FEC Identification Number
C00170712

Address (Number and Street)
2355 Stemmons Freeway, Suite 503

3. Is this Report an Amendment?
[X] YES [ ] NO

City, State and Zip Code
Dallas, TX 75205

[X] Check if address is different than previously reported.

4. TYPE OF REPORT

- [ ] April 15 Quarterly Report
- [X] July 15 Quarterly Report
- [ ] October 15 Quarterly Report
- [ ] January 31 Year End Report
- [ ] July 31 Mid Year Report (Non-election Year Only)
- [ ] 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

This report contains activity for — [X] Primary Election [X] General Election [ ] Special Election [ ] Runoff Election

5. SUMMARY Covering Period April 16, 1984 through June 30, 1984

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	1,427,492.52	2,257,126.67
(b) Total Contribution Refunds (from Line 20 (d))	765.00	1,050.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	1,426,727.52	2,256,076.67
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	1,608,310.81	3,434,055.11
(b) Total Offsets to Operating Expenditures (from Line 14)	11,017.27	11,017.27
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	1,597,293.54	3,423,037.84
8 Cash on Hand at Close of Reporting Period (from Line 27)	39,259.43	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	0.00	
10 Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	389,452.25	

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

JOHN P. BAXTER
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

12/14/84
Date

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

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

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

FEC FORM 3 (3/80)

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DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in Full) FRIENDS OF PHIL GRAMM	Report Covering the Period: From: Apr. 16, 1984 To: July 1, 1984		
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees (Memo Entry Unitemized $ 555,266.25)	1,177,580.46	1,940,079.98	11 (a)
(b) Political Party Committees.	15,000.00	15,190.50	11 (b)
(c) Other Political Committees	234,912.06	301,856.19	11 (c)
(d) The Candidate.			11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d).	1,427,492.52	2,257,126.67	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13 (a)
(b) All Other Loans.			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b)).			13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	11,017.27	11,017.27	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	99.61	2,532.49	15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	1,438,609.40	2,270,676.43	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	1,608,310.81	3,434,055.11	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	765.00	1,050.00	20 (a)
(b) Political Party Committees.			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))	765.00	1,050.00	20 (d)
21. OTHER DISBURSEMENTS.			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	1,609,075.81	3,435,105.11	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$ 209,725.84	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$ 1,438,609.40	24
25. SUBTOTAL (Add Line 23 and Line 24)	$ 1,648,335.24	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$ 1,609,075.81	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	$ 39,259.43	27

82040743207

SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for
LINE NUMBER 11a
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Mrs. Frances Freeman 7524 Glen Albens Dallas, TX 75225 Receipt For: xx Primary ☐ General ☐ Other (specify):	information requested not received Occupation Aggregate Year-to-Date—$ 1,000.00	4/30/84	$ 1,000.00
B. Mr. David Crowley 10265 Inwood Road Dallas, TX 75229 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Home Interiors & Gifts Occupation Aggregate Year-to-Date—$ 1,000.00	6/5/84	$ 1,000.00
C. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for
LINE NUMBER 11C
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code Houston Industries PAC P.O. Box 1700 Houston, TX 77001	Name of Employer N/A	Date (month, day, year) 5/3/84 5/3/84	Amount of Each Receipt this Period $4,500.00(P) 500.00(G)
Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$	5,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

8 3 0 4 0 7 4 5 8 0 9

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 5 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor P/M Consulting Freedom House 202 E St. NE Washington, D.C. 20002	$ 0.00 *	$288,842.64* (Exact amount of the bill is in dispute as of 6/30/84 pending further clarification)	$ 62,321.22	$226,521.42 *
Nature of Debt (Purpose): fundraising consulting fees and expenses				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Michael A. Sterlacci 5105-P Backlick Road Annandale, VA 22203	$ 0.00	$ 625.00	$ 0.00	$ 625.00
Nature of Debt (Purpose): legal fees				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Miller, Canfield, Paddock & Stone 2500 Comerica Building Detroit, MI 48226	$ 0.00	$ 18,838.32	$ 15,457.09	$ 3,381.23
Nature of Debt (Purpose): legal fees and expenses				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Karl Rove & Company P.O. Box 1902 Austin, TX 78767	$ 0.00	$164,730.65	$147,844.63	$ 16,886.02
Nature of Debt (Purpose): telephone bank expense; direct mail expense				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Praxis List Company P.O. Box 2352 Austin, TX 78768	$ 0.00	$ 9,502.21	$ 7,402.57	$ 2,099.64
Nature of Debt (Purpose): direct mail expense				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Aggieland Hotel 1502 S. Texas Avenue College Station, TX 77840	$ 0.00	$ 1,348.31	$ 0.00	$ 1,348.31
Nature of Debt (Purpose): room rentals & catering expense				
1) SUBTOTALS This Period This Page (optional)				$250,861.62
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Campac Publications 210 7th St. SE, Suite C25 Washington, D.C. 20003	$ 0.00	$ 11,178.00	$ 0.00	$ 11,178.00
Nature of Debt (Purpose): direct mail expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Capitol View Catering 2725 Penn. Ave. SE Washington, D.C. 20020	$ 0.00	$ 8,100.00	$ 0.00	$ 8,100.00
Nature of Debt (Purpose): reception catering fee				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Luce Press Clippings P.O. Box 379 Topeka, KS 66601	$ 0.00	$ 7,258.58	$ 1,294.43	$ 5,964.15
Nature of Debt (Purpose): press clipping service				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Flint Corporation 2355 Stemmons, Suite 503 Dallas, TX 75207	$ 0.00	$ 1,759.36	$ 0.00	$ 1,759.36
Nature of Debt (Purpose): computer installation expense				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Dependable Printing, Inc. 707 Montgomery Street Alexandria, VA 22314	$ 0.00	$ 21,497.49	$ 20,546.60	$ 950.89
Nature of Debt (Purpose): printing				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Communications Specialists, Inc. One Red River P.O. Box 1529 Austin, TX 78767	$ 0.00	$ 848.50	$ 0.00	$ 848.50
Nature of Debt (Purpose): direct mail expense				
1) SUBTOTALS This Period This Page (optional)				$ 28,800.90
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor The Casey Partners 2932 Robinhood Houston, TX 77005	$ 0.00	$ 2,321.59	$ 0.00	$ 2,321.59
Nature of Debt (Purpose): printing				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Western Union Telegram Company P.O. Box 84832 Dallas, TX 75284	$ 0.00	$ 602.00	$ 0.00	$ 602.00
Nature of Debt (Purpose): mailgram expense				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Black, Manafort, & Stone, Inc. 324 N. Fairfax Street Alexandria, VA 22314	$ 0.00	$ 25,836.98	$ 11,613.06	$ 14,223.92
Nature of Debt (Purpose): (not media buys) consulting fees & expenses				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Vanier Graphics Corporation P.O. Box 370 Santee, CA 92071	$ 0.00	$ 552.18	$ 0.00	$ 552.18
Nature of Debt (Purpose): printing				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Southwestern Bell P.O. Box 660012 Dallas, TX 75394	$ 0.00	$ 14,658.63	$ 13,499.99	$ 1,158.64
Nature of Debt (Purpose): long distance service				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Southwestern Bell P.O. Box 90 San Antonio. TX 78287	$ 0.00	$ 2,541.64	$ 1,730.25	$ 811.39
Nature of Debt (Purpose): long distance service				
1) SUBTOTALS This Period This Page (optional)				$ 19,669.72
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate schedules for each numbered line)

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Carey Hobbs Hobbs Bonded Fibers P.O. Box 151 Groesbeck, TX 76642	$ 0.00	$ 36,877.50	$ 17,871.50	$ 19,006.50
Nature of Debt (Purpose): staff and candidate air travel				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Texas Press Service 718 W. 5th Street Austin, TX 78701	$ 0.00	$ 3,153.15	$ 885.62	$ 2,267.53
Nature of Debt (Purpose): press clipping service				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor V. Lance Tarrance & Associates 3845 W. FM 1960, Suite 400 Houston, TX 77068	$ 0.00	$ 14,508.87	$ 867.27	$ 13,641.60
Nature of Debt (Purpose): research fees & expenses				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Fred Meyer c/o Tyler Corporation 3200 San Jacinto Tower Dallas, TX 75201	$ 0.00	$ 1,184.70	$ 0.00	$ 1,184.70
Nature of Debt (Purpose): reimbursement for room rentals and catering expense				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Adventure Printing 3441 Halifax Street Dallas, TX 75229	$ 0.00	$ 1,652.00	$ 0.00	$ 1,652.00
Nature of Debt (Purpose): printing				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Ailes Communications, Inc. 456 W. 43rd Street New York, N.Y. 10036	$ 0.00	$ 51,725.00	$ 36,225.00	$ 15,500.00
Nature of Debt (Purpose): media production & consulting fees				
1) SUBTOTALS This Period This Page (optional)				$ 53,252.33
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 5 of 5 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Arlin Development Corporation 2355 Stemmons, Suite 503 Dallas, TX 75207	$ 0.00	$ 4,000.00	$ 2,000.00	$ 2,000.00
Nature of Debt (Purpose): accounting services				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Campack Systems, Inc. 2000 M St. NW Washington, D.C. 20036	$ 0.00	$ 114,511.90	$ 79,644.22	$ 34,867.68
Nature of Debt (Purpose): computer services & direct mail expense				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				

1) SUBTOTALS This Period This Page (optional)	$ 36,867.68
2) TOTAL This Period (last page this line only)	$ 389,452.25
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	$ 0.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)	$ 389,452.25

C00407314

[redacted]

EXHIBIT D-2

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (in Full): FRIENDS OF PHIL GRAMM

2. FEC Identification Number: C00170712

Address (Number and Street): 2355 STEMMONS FREEWAY, SUITE 503

3. Is this Report an Amendment? [X] YES [ ] NO

City, State and Zip Code: DALLAS, TX 75207

[X] Check if address is different than previously reported.

4. TYPE OF REPORT

- [ ] April 15 Quarterly Report
- [ ] July 15 Quarterly Report
- [X] October 15 Quarterly Report
- [ ] January 31 Year End Report
- [ ] July 31 Mid Year Report (Non-election Year Only)
- [ ] 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

This report contains activity for — [X] Primary Election [X] General Election [ ] Special Election [ ] Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period July 1, 1984 through Sept. 30, 1984		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	3,157,288.99	5,414,415.66
(b) Total Contribution Refunds (from Line 20 (d))	4,900.00	5,950.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	3,152,388.99	5,408,465.66
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	3,108,616.12	6,542,671.23
(b) Total Offsets to Operating Expenditures (from Line 14)	0.00	11,017.27
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	3,108,616.12	6,531,653.96
8. Cash on Hand at Close of Reporting Period (from Line 27)	83,086.87	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	0.00	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	126,876.29	

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

JOHN P. BAXTER
Type or Print Name of Treasurer

John P. Baxter
SIGNATURE OF TREASURER

12/14/84
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 3 (3/80)

EX. D-2

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EXHIBIT D-2

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

2. FEC Identification Number
C00170712

Address (Number and Street)
2355 STEMMONS FREEWAY, SUITE 503

3. Is this Report an Amendment?
[X] YES [ ] NO

City, State and Zip Code
[X] Check if address is different than previously reported.
DALLAS, TX 75207

4. TYPE OF REPORT

- [ ] April 15 Quarterly Report
- [ ] July 15 Quarterly Report
- [X] October 15 Quarterly Report
- [ ] January 31 Year End Report
- [ ] July 31 Mid Year Report (Non-election Year Only)
- [ ] 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

This report contains activity for — [X] Primary Election [X] General Election [ ] Special Election [ ] Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period July 1, 1984 through Sept. 30, 1984		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	3,157,288.99	5,414,415.66
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7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	3,108,616.12	6,542,671.23
(b) Total Offsets to Operating Expenditures (from Line 14)	0.00	11,017.27
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	3,108,616.12	6,531,653.96
8. Cash on Hand at Close of Reporting Period (from Line 27)	83,086.87	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	0.00	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	126,876.29	

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

JOHN P. BAXTER
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

12/14/84
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 3 (3/80)

82043816

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in Full): Friends of Phil Gramm

Report Covering the Period: From: July 1, 1984 To: September 30, 1984

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	2,658,562.27	4,598,642.25	11 (a)
(Memo Entry Unitemized $ 1,051,889.31)			
(b) Political Party Committees	3,042.60	18,233.10	11 (b)
(c) Other Political Committees	495,684.12	797,540.31	11 (c)
(d) The Candidate			11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d).	3,157,288.99	5,414,415.66	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13 (a)
(b) All Other Loans			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))			13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		11,017.27	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	54.57	2,587.06	15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	3,157,343.56	5,428,019.99	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	3,108,616.12	6,542,671.23	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	4,900.00	5,950.00	20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))	4,900.00	5,950.00	20 (d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	3,113,516.12	6,548,621.23	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$	39,259.43	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$	3,157,343.56	24
25. SUBTOTAL (Add Line 23 and Line 24)	$	3,196,602.99	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$	3,113,516.12	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	$	83,086.87	27

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 4 for LINE NUMBER 11a
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mrs. John M. Stemmons, Jr. 2700 Stemmons Freeway Dallas, TX 75207	Industrial Properties	9/24/84	$1,000.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation: Owner	Aggregate Year-to-Date—$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mr. Louis A. Beecherl, Jr. 3801 Beverly Drive Dallas, TX 75205	Texas Oil & Gas	9/24/84 9/24/84	$1,000.00 (P) $1,000.00 (G)
Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Occupation: Executive	Aggregate Year-to-Date—$ 2,000.00	
C. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mr. L.D. Burns One Parker Square, Suite 500 Wichita Falls, TX 76308	L.D. Burns Drilling Company	8/15/84 8/23/84	$1,000.00 (P) $1,000.00 (G)
Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Occupation: Owner	Aggregate Year-to-Date—$ 2,000.00	
D. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mr. Arthur Cary 2519 Farrington Dallas, TX 75207	Cary Products Co.	7/23/84 9/24/84	$1,000.00 (P) $1,000.00 (G)
Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Occupation: Engineer	Aggregate Year-to-Date—$ 2,000.00	
E. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mr. Frank Cass 2727 Routh Street Dallas, TX 75201	information requested not received	9/24/84 9/24/84	$1,000.00 (P) $1,000.00 (G)
Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Occupation:	Aggregate Year-to-Date—$ 2,000.00	
F. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mr. David Crowley 10265 Inwood Road Dallas, TX 75229	Home Interiors & Gifts	9/24/84	$ 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation: Partner	Aggregate Year-to-Date—$ 1,500.00	
G. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mr. Gilbert M. Denman, Jr. 535 San Antonio Bank & Trust Bldg. San Antonio, TX 78205	Denman, Franklin, & Denman	7/17/84 7/17/84	$1,000.00 (P) $1,000.00 (G)
Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Occupation: Attorney	Aggregate Year-to-Date—$ 2,000.00	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 2 of 4 for LINE NUMBER 11a
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Mr. Richard Doornbos P.O. Box 696 Nederland, TX 77627 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	C. Doornbos, Inc. Occupation: Investments Aggregate Year-to-Date—$ 1,700.00	9/26/84 9/26/84	$ 200.00 (P) $1,000.00 (G)
B. Mr. Roland Arthur 1711 N. Beltline Road Irving, TX 75015 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Arthur Equipment Co. Occupation: Owner Aggregate Year-to-Date—$ 2,000.00	9/24/84 9/24/84	$1,000.00 (P) $1,000.00 (G)
C. Mr. B.G. Brookshire P.O. Box 1411 Tyler, TX 75701 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Brookshire Grocery Occupation: Owner Aggregate Year-to-Date—$ 1,100.00	7/23/84 7/24/84	$ 100.00 (G) $1,000.00 (P)
D. Mr. William E. Burford 1400 Main Street Dallas, TX 75202 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Texas Art Gallery Occupation: President Aggregate Year-to-Date—$ 2,000.00	8/23/84 8/23/84	$1,000.00 (P) $1,000.00 (G)
E. Mr. R.L. Foree, Sr. 3300 Interfirst One Bldg. Dallas, TX 75202 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	self-employed Occupation: private investor Aggregate Year-to-Date—$ 1,000.00	7/2/84	$1,000.00 (P)
F. Mr. Joe B. Kercheville 100 NBC Building SanAntonio, TX 78205 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	information requested not received Occupation: Aggregate Year-to-Date—$ 2,000.00	9/24/84 9/24/84	$1,000.00 (P) $1,000.00 (G)
G. Mr. Frank W. Mayborn 10 S. 3rd Street Temple, TX 76501 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Temple Telegram Occupation: Publisher/Owner Aggregate Year-to-Date—$ 2,000.00	7/12/84 9/24/84	$1,000.00 (G) $1,000.00 (P)

SUBTOTAL of Receipts This Page (optional) . . . . . .

TOTAL This Period (last page this line number only) . . . . . .

SCHEDULE A **ITEMIZED RECEIPTS**

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code Ms. Catharine W. McAnally 620 S. Taylor Amarillo, TX 79101 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Name of Employer information requested not received Occupation Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 9/24/84 9/24/84	Amount of Each Receipt this Period $1,000.00 (P) $1,000.00 (G)
B. Full Name, Mailing Address and ZIP Code Mr. William H. Martin 1804 1st National Bank Bldg. Midland, TX 79701 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Name of Employer self-employed Occupation petroleum engineer Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 7/30/84 7/30/84	Amount of Each Receipt This Period $1,000.00 (P) $1,000.00 (G)
C. Full Name, Mailing Address and ZIP Code Ms. Anne Pickens 3926 Potomac Dallas, TX 75205 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Name of Employer information requested not received Occupation Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 7/30/84 7/30/84	Amount of Each Receipt This Period $1,000.00 (P) $1,000.00 (G)
D. Full Name, Mailing Address and ZIP Code Mr. S.S. Seltzer, Jr. 4025 Ocean Drive P.O. Box 6382 Corpus Christi, TX 78411 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Name of Employer N/A Occupation retired Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 8/15/84 8/15/84	Amount of Each Receipt This Period $1,000.00 (P) $1,000.00 (G)
E. Full Name, Mailing Address and ZIP Code Mr. Wayne Thomas P.O. Box 1917 Hereford, TX 79045 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Name of Employer Thomas & Burdette Occupation attorney Aggregate Year-to-Date—$ 1,100.00	Date (month, day, year) 8/20/84 9/24/84	Amount of Each Receipt This Period $1,000.00 (P) $ 100.00 (G)
F. Full Name, Mailing Address and ZIP Code Mr. Robert L. Trimble P.O. Box 8020087 Dallas, TX 75380 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Name of Employer Southwestern Baptist Teological Seminary Occupation audio-visual director Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 9/19/84 9/19/84	Amount of Each Receipt This Period $1,000.00 (P) $1,000.00 (G)
G. Full Name, Mailing Address and ZIP Code Mrs. Lellia Windom 1562 South Drive Sarasota, FL 33579 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Name of Employer information requested not received Occupation Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 9/24/84 9/24/84	Amount of Each Receipt This Period $1,000.00 (P) $1,000.00 (G)
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 4 of 4 for LINE NUMBER 11a
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code Mrs. R.L. Foree, Sr. 3300 Interfirst One Building Dallas, TX 75202 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer self-employed Occupation private investor Aggregate Year-to-Date—$ 1,000.00	Date (month, day, year) 8/15/84	Amount of Each Receipt this Period $ 1,000.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A ● **ITEMIZED RECEIPTS** ●

Page 1 of 1 for LINE NUMBER 11c
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code American Bankers Association PAC 1120 Conn. Ave. NW Washington, D.C. 20036 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Name of Employer: N/A Occupation: N/A Aggregate Year-to-Date—$ 10,000.00	Date (month, day, year): 9/24/84 9/24/84	Amount of Each Receipt this Period: $5,000.00 (P) $5,000.00 (G)
B. Full Name, Mailing Address and ZIP Code Union Pacific Fund 1120 20th St. NW One Lafayette Center #600S Washington, D.C. 20026 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Name of Employer: N/A Occupation: N/A Aggregate Year-to-Date—$ 10,000.00	Date (month, day, year): 8/10/84 9/24/84	Amount of Each Receipt This Period: $5,000.00 (P) $5,000.00 (G)
C. Full Name, Mailing Address and ZIP Code Sperry PAC 2000 L Street NW, Suite 810 Washington, D.C. 20036 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer: Incorrectly attributed to the National Assoc. of Homebuilders PAC Occupation: on original FEC report Aggregate Year-to-Date—$ 500.00	Date (month, day, year): 9/20/84	Amount of Each Receipt This Period: $ 500.00
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 7 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (In Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
FRIENDS OF PHIL GRAMM				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor P/M Consulting Freedom House 202 E Street NE Washington, D.C. 20002	$*226,521.42 *(Exact amount in dispute pending clarification)	$ 103,041.10	$ 285,941.10	$ *31,500.00 *($12,121.42 was determined to have been incorrectly billed)
Nature of Debt (Purpose): fundraising consulting fees and expenses				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Michael A. Sterlacci 5105-P Backlick Road Annandale, VA 22203	$ 625.00	$ 750.00	$ 625.00	$ 750.00
Nature of Debt (Purpose): legal fees				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Miller, Canfield, Paddock & Stone 2500 Comerica Building Detroit, MI 48226	$ 3,381.23	$ 9,947.13	$ 6,010.23	$ 7,318.13
Nature of Debt (Purpose): legal fees and expenses				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Karl Rove & Company P.O. Box 1902 Austin, TX 78767	$ 16,886.02	$ 661.56	$ 17,547.58	$ 0.00
Nature of Debt (Purpose): telephone bank expense; direct mail expense				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Praxis List Company P.O. Box 2352 Austin, TX 78768	$ 2,099.64	$ 0.00	$ 2,099.64	$ 0.00
Nature of Debt (Purpose): direct mail expense				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Aggieland Hotel 1502 S. Texas Avenue College Station, TX 77840	$ 1,348.31	$ 0.00	$ 1,348.31	$ 0.00
Nature of Debt (Purpose): room rentals & catering expense				
1) SUBTOTALS This Period This Page (optional)				$ 39,568.13
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Campaign Systems 300 Sewell Court Irving, TX 75038	$ 0.00	$ 18,267.13	$ 0.00	$ 18,267.13
Nature of Debt (Purpose): direct mail expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Campac Publications 210 7th St. SE, Suite C25 Washington, D.C. 20003	$ 11,178.00	$ 1,897.80	$ 2,058.36	$ 11,017.44
Nature of Debt (Purpose): direct mail expense				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Capitol View Catering 2725 Penn. Ave. SE Washington, D.C. 20020	$ 8,100.00	$ 0.00	$ 8,100.00	$ 0.00
Nature of Debt (Purpose): reception catering fee				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Luce Press Clipping P.O. Box 379 Topeka, KS 66601	$ 5,964.15	$ 1,403.05	$ 6,231.33	$ 1,135.87
Nature of Debt (Purpose): press clipping service				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Flint Corporation 2355 Stemmons, Suite 503 Dallas, TX 75207	$ 1,759.36	$ 810.91	$ 2,570.27	$ 0.00
Nature of Debt (Purpose): computer installation & equipment expens				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Dependable Printing, Inc. 707 Montgomery St. Alexandria, VA 22314	$ 950.89	$ 0.00	$ 950.89	$ 0.00
Nature of Debt (Purpose): printing				
1) SUBTOTALS This Period This Page (optional)				$ 30,420.44
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate schedules for each numbered line)

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Communications Specialties, Inc. One Red River PO Box 1529 Austin, TX 78767	$ 848.50	$ 10,733.74	$ 11,582.24	$ 0.00
Nature of Debt (Purpose): direct mail expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor The Casey Partners 2932 Robinhood Houston, TX 77005	$ 2,321.59	$ 0.00	$ 2,321.59	$ 0.00
Nature of Debt (Purpose): printing				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Western Union Telegraph Company P.O. Box 84832 Dallas, TX 75284	$ 602.00	$ 685.39	$ 1,287.39	$ 0.00
Nature of Debt (Purpose): mailgram expense				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Black, Manafort & Stone 324 N. Fairfax Street Alexandria, VA 22314	$ 14,223.92	$ 17,969.49	$ 25,729.75	$ 6,463.66
Nature of Debt (Purpose): (not media buys) consulting fees & expenses				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Vanier Graphics Corporation P.O. Box 370 Santee, CA 92017	$ 552.18	$ 16.14	$ 568.32	$ 0.00
Nature of Debt (Purpose): printing				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Southwestern Bell P.O. Box 660012 Dallas, TX 75394	$ 1,158.64	$ 12,491.37	$ 11,045.70	$ 2,604.31
Nature of Debt (Purpose): long distance service				
1) SUBTOTALS This Period This Page (optional)				$ 9,067.97
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 4 of 7 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Southwestern Bell P.O. Box 90 San Antonio, TX 78287	$ 811.39	$ 10,286.70	$ 8,335.63	$ 2,762.46
Nature of Debt (Purpose): long distance service				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Southwestern Bell P.O. Box 3025 Houston, TX 77097	$ 0.00	$ 1,925.98	$ 1,307.74	$ 618.24
Nature of Debt (Purpose): long distance service				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Carey Hobbs Hobbs Bonded Fibers P.O. Box 151 Groesbeck, TX 76642	$ 19,006.50	$ 29,897.00	$ 48,903.50	$ 0.00
Nature of Debt (Purpose): staff and candidate air travel				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Texas Press Service 718 W. 5th Street Austin, TX 78701	$ 2,267.53	$ 1,867.45	$ 4,134.98	$ 0.00
Nature of Debt (Purpose): press clipping service				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Fred Meyer c/o Tyler Corporation 3200 San Jacinto Tower Dallas, TX 75201	$ 1,184.70	$ 0.00	$ 1,184.70	$ 0.00
Nature of Debt (Purpose): reimbursement for room rental & catering expense				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor V. Lance Tarrance & Associates 3845 W. FM 1960, Suite 400 Houston, TX 77068	$ 13,641.60	$ 41,607.00	$ 39,248.60	$ 16,000.00
Nature of Debt (Purpose): research survey fees & expenses				
1) SUBTOTALS This Period This Page (optional)				$ 19,380.70
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate schedules for each numbered line)

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Adenture Printing 3441 Halifax Street Dallas, TX 75229	$ 1,652.00	$ 7,497.92	$ 9,149.92	$ 0.00
Nature of Debt (Purpose): printing				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Ailes Communications, Inc. 456 W. 43rd Street New York, N.Y. 10036	$ 15,500.00	$124,183.35	$139,683.35	$ 0.00
Nature of Debt (Purpose): media production & consulting fees				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Arlin Development Corporation 2355 Stemmons, # 503 Dallas, TX 75207	$ 2,000.00	$ 6,000.00	$ 8,000.00	$ 0.00
Nature of Debt (Purpose): accounting services				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Campack Systems Corporation 2000 M Street NW Washington, D.C. 20036	$ 34,867.68	$ 99,679.20	$129,939.46	$ 4,607.42
Nature of Debt (Purpose): direct mail expense				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Market Opinion Research 550 Washington Boulevard Detroit, MI 48226	$ 0.00	$ 35,009.18	$ 34,500.00	$ 509.18
Nature of Debt (Purpose): phone bank fees & expenses				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Beaumont Plaza Holiday Inn 3950 I-10 South Beaumont, TX 77705	$ 0.00	$ 1,854.34	$ 0.00	$ 1,854.34
Nature of Debt (Purpose): fundraiser catering fee				
1) SUBTOTALS This Period This Page (optional)				$ 6,970.94
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Bill Hicks P.O. Drawer 1312 Odessa,TX 79760	$ 0.00	$ 908.34	$ 0.00	$ 908.34
Nature of Debt (Purpose): fundraising expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Payne Letter Shop 1800 NE Loop 410, Suite 50 San Antonio, TX 75217	$ 0.00	$ 1,372.24	$ 0.00	$ 1,372.24
Nature of Debt (Purpose): printing				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor AT & T Information Systems P.O. Box 27850 Kansas City, MO 64180	$ 0.00	$ 4,125.48	$ 3,592.18	$ 533.30
Nature of Debt (Purpose): long distance service				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Odessa Chuck Wagon Gang P.O. Box 334 Odessa, TX 79760	$ 0.00	$ 2,310.00	$ 0.00	$ 2,310.00
Nature of Debt (Purpose): fundraising catering expense				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Ramada Inn 410 S. Texas Avenue College Station, TX 77801	$ 0.00	$ 509.13	$ 0.00	$ 509.13
Nature of Debt (Purpose): reception room rental & catering fee				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor The Shoreham 2500 Calvert St. NW Washington, D.C. 20008	$ 0.00	$ 2,205.10	$ 0.00	$ 2,205.10
Nature of Debt (Purpose): reception room rental & catering fee				
1) SUBTOTALS This Period This Page (optional)				$ 7,838.11
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
FRIENDS OF PHIL GRAMM				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Data Logic P.O. Box 831420 Richardson, TX 75080	$ 0.00	$ 6,788.70	$ 5,418.90	$ 1,369.80
Nature of Debt (Purpose): contract labor expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Farmers Market Bar-B-Q 2700 Texas Avenue Bryan, TX 77801	$ 0.00	$ 5,881.34	$ 0.00	$ 5,881.34
Nature of Debt (Purpose): Fundraising catering fee				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Dr. John A. Welty 1518 S. Parkwood Harlingen, TX 78550	$ 0.00	$ 1,710.00	$ 0.00	$ 1,710.00
Nature of Debt (Purpose): fundraiser expense reimbursement				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Walden On Lake Conroe 14001 Walden Road Montgomery, TX 77756	$ 0.00	$ 4,668.86	$ 0.00	$ 4,668.86
Nature of Debt (Purpose): reception room rental & catering fee				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				

1) SUBTOTALS This Period This Page (optional)	$ 13,630.00
2) TOTAL This Period (last page this line only)	$ 126,876.29
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	$ 0.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)	$ 126,876.29

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EXHIBIT D-3

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

2. FEC Identification Number
C00170712

Address (Number and Street)
2355 STEMMONS FREEWAY, SUITE 503

3. Is this Report an Amendment?
[X] YES [ ] NO

City, State and Zip Code
[X] Check if address is different than previously reported.
DALLAS, TX 75207

4. TYPE OF REPORT

- [ ] 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)
- [X] Twelfth day report preceding General (Type of Election) election on Nov. 6, 1984 in the State of TEXAS
- [ ] Thirtieth day report following the General Election on _____ in the State of _____
- [ ] Termination Report

This report contains activity for — [X] Primary Election [X] General Election [ ] Special Election [ ] Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period Oct. 1, 1984 through Oct. 17, 1984		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	1,047,696.31	6,462,111.97
(b) Total Contribution Refunds (from Line 20 (d))	0.00	5,950.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	1,047,696.31	6,456,161.97
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	863,426.34	7,406,097.57
(b) Total Offsets to Operating Expenditures (from Line 14)	450.00	11,467.27
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	862,976.34	7,394,630.30
8. Cash on Hand at Close of Reporting Period (from Line 27)	267,806.84	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	0.00	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	334,357.79	

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

JOHN P. BAXTER
Type or Print Name of Treasurer

John P. Baxter
SIGNATURE OF TREASURER

12/14/84
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 3 (3/80)

EX. D-3

8900743731

[redacted]

EXHIBIT D-3

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (in Full): FRIENDS OF PHIL GRAMM

2. FEC Identification Number: C00170712

Address (Number and Street): 2355 STEMMONS FREEWAY, SUITE 503

3. Is this Report an Amendment? [X] YES [ ] NO

City, State and Zip Code: DALLAS, TX 75207

[X] Check if address is different than previously reported.

4. TYPE OF REPORT

- [ ] 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)
- [X] Twelfth day report preceding General (Type of Election) election on Nov. 6, 1984 in the State of TEXAS
- [ ] Thirtieth day report following the General Election on _____ in the State of _____
- [ ] Termination Report

This report contains activity for — [X] Primary Election [X] General Election [ ] Special Election [ ] Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period Oct. 1, 1984 through Oct. 17, 1984		
6 Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	1,047,696.31	6,462,111.97
(b) Total Contribution Refunds (from Line 20 (d))	0.00	5,950.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	1,047,696.31	6,456,161.97
7 Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	863,426.34	7,406,097.57
(b) Total Offsets to Operating Expenditures (from Line 14)	450.00	11,467.27
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	862,976.34	7,394,630.30
8 Cash on Hand at Close of Reporting Period (from Line 27)	267,806.84	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	0.00	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	334,357.79	

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

JOHN P. BAXTER
Type or Print Name of Treasurer

[signature]
SIGNATURE OF TREASURER

12/14/84
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 3 (3/80)

8 9 0 4 0 7 4 3 8 3 2

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in Full)	Report Covering the Period:		
Friends of Phil Gramm	From: Oct. 1, 1984	To: Oct. 17, 1984	
I. RECEIPTS	**COLUMN A Total This Period**	**COLUMN B Calendar Year-to-Date**	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	824,667.20	5,423,309.45	11 (a)
(Memo Entry Unitemized $ 312,725.75)			
(b) Political Party Committees	6,000.00	24,233.10	11 (b)
(c) Other Political Committees	217,029.11	1,014,569.42	11 (c)
(d) The Candidate			11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d).	1,047,696.31	6,462,111.97	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13 (a)
(b) All Other Loans			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))			13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	450.00	11,467.27	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)		2,587.06	15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	1,048,146.31	6,476,166.30	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	863,426.34	7,406,097.57	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		5,950.00	20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))		5,950.00	20 (d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	863,426.34	7,412,047.57	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$ 83,086.87	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$ 1,048,146.31	24
25. SUBTOTAL (Add Line 23 and Line 24)	$ 1,131,233.18	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$ 863,426.34	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	$ 267,806.84	27

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 2 for LINE NUMBER 11a
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code Mr. Ross Workman P.O. Box 1396 Houston, TX 77251 Receipt For: X Primary X General ☐ Other (specify):	Name of Employer Transco Occupation Executive Aggregate Year-to-Date—$ 1,050.00	Date (month, day, year) 10/9/84 10/9/84	Amount of Each Receipt this Period $ 50.00 (P) $1,000.00 (G)
B. Full Name, Mailing Address and ZIP Code Mrs. Edith Jones O'Donnell 3266 Interfirst One Dallas, TX 75202 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation housewife Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 10/5/84	Amount of Each Receipt This Period $1,000.00
C. Full Name, Mailing Address and ZIP Code Mrs. Adele Bottom 1200 Elm Mission, TX Receipt For: X Primary X General ☐ Other (specify):	Name of Employer information requested not received Occupation Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 10/3/84 10/3/84	Amount of Each Receipt This Period $1,000.00 (P) $1,000.00 (G)
D. Full Name, Mailing Address and ZIP Code Mr. P. Gill P.O. Box 599 San Antonio, TX 78292 Receipt For: X Primary X General ☐ Other (specify):	Name of Employer Richard Gill Company Occupation mortgage banker Aggregate Year-to-Date—$ 1,200.00	Date (month, day, year) 10/12/84 10/12/84	Amount of Each Receipt This Period $1,000.00 (P) $ 200.00 (G)
E. Full Name, Mailing Address and ZIP Code Mr. George S. Hawn 101 N. Shoreline Corpus Christi, TX 78401 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer Hawn Brothers Occupation President Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 10/4/84 10/4/84	Amount of Each Receipt This Period $1,000.00 (P) $1,000.00 (G)
F. Full Name, Mailing Address and ZIP Code Mrs. H.L. Hunt 1401 Interfirst One Dallas, TX 75202 Receipt For: X Primary X General ☐ Other (specify):	Name of Employer N/A Occupation housewife Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 10/3/84 10/3/84	Amount of Each Receipt This Period $1,000.00 (P) $1,000.00 (G)
G. Full Name, Mailing Address and ZIP Code Mr. Ray L. Hunt 1401 Interfirst One Dallas, TX 75202 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer Hunt Oil Company Occupation President Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 10/3/84 10/3/84	Amount of Each Receipt This Period $1,000.00 (P) $1,000.00 (G)
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

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

Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Mrs. Nancy A. Hunt 1401 Interfirst One Dallas, TX 75202 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	N/A housewife Aggregate Year-to-Date—$ 2,000.00	10/3/84 10/3/84	$1,000.00(P) $1,000.00(G)
B. Mr. Robert L. Bradley 4200 Texas Commerce Tower Houston, TX 77002 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Andrews & Kurth attorney Aggregate Year-to-Date—$ 2,000.00	8/13/84	$1,000.00
C. Mr. Walter M. Mischer, Jr. 2727 North Loop West Houston, TX 77008 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Allied Banks CEO Aggregate Year-to-Date—$ 2,000.00	10/9/84 10/9/84	$1,000.00(P) $1,000.00(G)
D. Mr. Frank L. Scanio, Jr. La Rosa Ranch Woodsboro, TX 78393 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	self-employed rancher Aggregate Year-to-Date—$ 2,000.00	10/4/84 10/4/84	$1,000.00(P) $1,000.00(G)
E. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date—$		
F. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date—$		
G. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date—$		

SUBTOTAL of Receipts This Page (optional) . . . . . .

TOTAL This Period (last page this line number only) . . . . . .

SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for LINE NUMBER 11c
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code Tenneco Employees Good Government P.O. Box 2511 Houston, TX 77001 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Fund N/A Occupation Aggregate Year-to-Date—$ 10,000.00	Date (month, day, year) 10/9/84 10/10/84	Amount of Each Receipt this Period $4,000.00(P) $1,000.00(P)
B. Full Name, Mailing Address and ZIP Code National Home-Builders PAC 15th & M Streets NW Washington, D.C. 20005 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date—$ 10,000.00	Date (month, day, year) 10/12/84	Amount of Each Receipt This Period $5,000.00
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 7 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (in Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor P/M Consulting Freedom House 202 E Street NE Washington, D.C. 20002	$ 31,500.00	$ 139,551.32	$ 0.00	$ 171,051.32
Nature of Debt (Purpose): fundraising consulting fees & expenses				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Michael A. Sterlacci 5105-P Backlick Road Annandale, VA 22203	$ 750.00	$ 0.00	$ 0.00	$ 750.00
Nature of Debt (Purpose): legal fees				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Naman, Howell, Smith & Lee P.O. Box 1470 Waco, TX 76703	$ 0.00	$ 3,244.46	$ 0.00	$ 3,244.46
Nature of Debt (Purpose): contract labor & office expenses				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Miller, Canfield, Paddock, & Stone 2500 Comerica Building Detroit, MI 48226	$ 7,318.13	$ 1,828.70	$ 0.00	$ 9,146.83
Nature of Debt (Purpose): legal fees and expenses				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Campac Publications 210 7th St. SE, Suite C25 Washington, D.C. 20003	$ 11,017.44	$ 1,200.00	$ 0.00	$ 12,217.44
Nature of Debt (Purpose): direct mail expense				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Campaign Systems 300 Sewell Court Irving, TX 75038	$ 18,267.13	$ 0.00	$ 18,267.13	$ 0.00
Nature of Debt (Purpose): direct mail expense				

1) SUBTOTALS This Period This Page (optional)	$196,410.05
2) TOTAL This Period (last page this line only)	
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)	

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 2 of 7 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (in Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Luce Press Clippings P.O. Box 379 Topeka, KS 66601	$ 1,135.87	$ 0.00	$ 1,135.87	$ 0.00
Nature of Debt (Purpose): press clipping service				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Black, Manafort & Stone 324 N. Fairfax Street Alexandria, VA 22314	$ 6,463.66	$ 0.00	$ 0.00	$ 6,463.66
Nature of Debt (Purpose): (not media buys) consulting fees & expenses				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Southwestern Bell P.O. Box 660012 Dallas, TX 75394	$ 2,604.31	$ 1,188.20	$ 1,390.17	$ 2,402.34
Nature of Debt (Purpose): long distance service				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Southwestern Bell P.O. Box 90 San Antonio, TX 78287	$ 2,762.46	$ 4,808.96	$ 2,890.00	$ 4,681.42
Nature of Debt (Purpose): long distance service				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Southwestern Bell P.O. Box 3025 Houston, TX 77097	$ 618.24	$ 0.00	$ 0.00	$ 618.24
Nature of Debt (Purpose): long distance service				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor V. Lance Tarrance & Associates 3845 W. FM 1960, Suite 400 Houston, TX 77068	$ 16,000.00	$ 6,676.00	$ 0.00	$ 22,676.00
Nature of Debt (Purpose): research survey fees & expenses				
1) SUBTOTALS This Period This Page (optional)				$ 36,841.66
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 3 of 7 for
LINE NUMBER 10
(Use seperate schedules for each numbered line)

Name of Committee (in Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Campack Systems Corporation 2000 M Street NW Washington, D.C. 20036	$ 4,607.42	$ 0.00	$ 4,607.42	$ 0.00
Nature of Debt (Purpose): direct mail expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Market Opinion Research 550 Washington Boulevard Detroit, MI 48226	$ 509.18	$ 50,437.80	$ 0.00	$ 50,946.98
Nature of Debt (Purpose): phone bank fees & expenses				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Beaumont Plaza Holiday Inn 3950 I-10 South Beaumont, TX 77705	$ 1,854.34	$ 0.00	$ 0.00	$ 1,854.34
Nature of Debt (Purpose): fundraiser catering fee				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Bill Hicks P.O. Drawer 1312 Odessa, TX 79760	$ 908.34	$ 0.00	$ 0.00	$ 908.34
Nature of Debt (Purpose): fundraising expense				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Payne Letter Shop 1800 NE Loop 410, Suite 50 San Antonio, TX 75217	$ 1,372.24	$ 0.00	$ 0.00	$ 1,372.24
Nature of Debt (Purpose): printing				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor AT & T Information Systems P.O. Box 27850 Kansas City, MO 64180	$ 533.30	$ 500.02	$ 0.00	$ 1,033.32
Nature of Debt (Purpose): long distance service				
1) SUBTOTALS This Period This Page (optional)				$ 56,115.22
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (in Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Odessa Chuck Wagon Gang P.O. Box 334 Odessa, TX 79760	$ 2,310.00	$ 0.00	$ 2,310.00	$ 0.00
Nature of Debt (Purpose): fundraising catering expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Ramada Inn 410 S. Texas Avenue College Station, TX 77801	$ 509.13	$ 0.00	$ 509.13	$ 0.00
Nature of Debt (Purpose): reception room rental & catering fee				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor The Shoreham 2500 Calvert Street NW Washington, D.C. 20008	$ 2,205.10	$ 0.00	$ 2,205.10	$ 0.00
Nature of Debt (Purpose): reception room rental & catering fee				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Data Logic P.O. Box 831420 Richardson, TX 75080	$ 1,369.80	$ 0.00	$ 1,369.80	$ 0.00
Nature of Debt (Purpose): contract labor expense				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Farmers Market Bar-B-Q 2700 Texas Avenue Bryan, TX 77801	$ 5,881.34	$ 0.00	$ 5,881.34	$ 0.00
Nature of Debt (Purpose): fundraising catering fee				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Dr. John A. Welty 1518 S. Parkwood Harlingen, TX 78550	$ 1,710.00	$ 0.00	$ 1,710.00	$ 0.00
Nature of Debt (Purpose): fundraiser expense reimbursement				
1) SUBTOTALS This Period This Page (optional)				$ 0.00
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (in Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Walden On Lake Conroe 14001 Walden Road Montgomery, TX 77756	$ 4,668.86	$ 0.00	$ 4,668.86	$ 0.00
Nature of Debt (Purpose): reception room rental & catering fee				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Preferred Lists 499 S. Capitol Street SE, # 104 Washington, D.C. 20003	$ 0.00	4,277.38	$ 0.00	$ 4,277.38
Nature of Debt (Purpose): direct mail expense				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Republican Party of Harris County 3215 W. Alabama Houston, TX 77098	$ 0.00	973.59	$ 0.00	$ 973.59
Nature of Debt (Purpose): printing, tracking, get-out-the-vote expense				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Hobbs Bonded Fibers P.O. Box 151 Groesbeck, TX 76642	$ 0.00	$ 6,175.50	$ 0.00	$ 6,175.50
Nature of Debt (Purpose): air travel for candidate & staff				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Hilton Palacio Del Rio P.O. Box 692 San Antonio, TX 78293	$ 0.00	$ 8,056.84	$ 6,000.00	$ 2,056.84
Nature of Debt (Purpose): fundraising facility rental & catering fee				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor The Coronado Club Bank of the Southwest-5th Floor Houston, TX 77002	$ 0.00	$ 1,152.38	$ 0.00	$ 1,152.38
Nature of Debt (Purpose): fundraising facility rental & catering expense				
1) SUBTOTALS This Period This Page (optional)				$ 14,635.69
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 6 of 7 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Communications Specialists, Inc. One Red River P.O. Box 1529 Austin, TX 78767	$ 0.00	$ 17,227.15	$ 0.00	$ 17,227.15
Nature of Debt (Purpose): direct mail expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Arlin Development Company 2355 Stemmons, # 503 Dallas, TX 75207	$ 0.00	$ 2,000.00	$ 0.00	$ 2,000.00
Nature of Debt (Purpose): accounting services				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Byron Franklin 1318 E. 29th Houston, TX 77009	$ 0.00	$ 1,908.25	$ 0.00	$ 1,908.25
Nature of Debt (Purpose): fundraiser catering expense reimbursement				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Quik Print Commerce Square Austin, TX 78751	$ 0.00	$ 1,363.94	$ 0.00	$ 1,363.94
Nature of Debt (Purpose): printing				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Federal Express Corporation P.O. Box 727, Dept. A Memphis, TN 38194	$ 0.00	$ 638.00	$ 0.00	$ 638.00
Nature of Debt (Purpose): shipping/delivery expense				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Asman Custom Photo Service 926 Penn. Ave. SE Washington, D.C. 20003	$ 0.00	$ 636.00	$ 0.00	$ 636.00
Nature of Debt (Purpose): photography expense				
1) SUBTOTALS This Period This Page (optional)				$ 23,773.34
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (In Full) FRIENDS OF PHIL GRAMM	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor IBM Corporation P.O. Box 660176 Dallas, TX 75266	$ 0.00	$ 1,491.04	$ 0.00	$ 1,491.04
Nature of Debt (Purpose): equipment rental & supplies				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Monroe Systems Box 9000R Morristown, N.J. 07960	$ 0.00	$ 894.34	$ 0.00	$ 894.34
Nature of Debt (Purpose): copier rental & supplies				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Espinoza Printing 1815 Young Dallas, TX 75201	$ 0.00	5,026.00	$ 3,337.55	$ 1,688.45
Nature of Debt (Purpose): printing				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Western Union P.O. Box 84832 Dallas, TX 75284	$ 0.00	$ 4,273.00	$ 1,765.00	$ 2,508.00
Nature of Debt (Purpose): mailgram expense				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				$ 6,581.83
2) TOTAL This Period (last page this line only)				$334,357.79
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				$ 0.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				$334,357.79

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter)
)
Senator Phil Gramm)
The Friends of Phil Gramm) MUR 1837
and John Baxter, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Office of the General Counsel received a complaint on November 1, 1984, from Ms. Donna Mobley of Austin, Texas. Alleging violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), the complaint cited as violators Senator Phil Gramm, the Friends of Phil Gramm ("the Committee"), the treasurer and assistant treasurer of the Committee, John Baxter and Ruth Cymber, 1/ and 170 other persons. 2/ The basis of the complaint is the Committee's failure to report and itemize its outstanding debts and obligations on the 1984 July and October Quarterly Reports and the 1984 Pre-primary Report.

The complaint alleges two alternative violations. First, the Committee is said to have failed to report its primary debts and obligations to the Commission as required by the Act. Alternatively, the Committee is assumed not to have a primary debt. A lack of a primary debt is said to have resulted in the other respondents making excessive contributions to the Committee. These excessive contributions are attributed to

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1/ The Act imposes liability on an assistant treasurer where a treasurer is either unavailable or no longer in office. See 11 C.F.R. § 102.7(a). Because neither contingency is known to have occurred, no recommendations are made regarding Ms. Cymber, the assistant treasurer.

2/ See Attachment 1.

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persons who made a primary contribution after the date of the primary and who also contributed the maximum permitted amount to the general election. Under the Commission's regulations, contributions made to the primary after the date of the primary, when a committee has no primary debt, result in contributions to the general election. See 11 C.F.R. § 110.1(a)(2)(i). Because these respondents already contributed the maximum amount to the general election, excessive contributions are alleged. Both of the alternative violations are alleged to be knowing and willful. 3/

This report is divided into three segments. Part One addresses six classes of violations gleaned from the Committee's responses, responses filed on behalf of individuals by the Committee's counsel, other responses of individuals, and disclosure reports. 4/ Part Two addresses improperly designated contributions. Part Three notes the need to audit the Committee in light of a mass of reporting errors, omissions, misstatements, and inaccuracies.

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3/ At this time, this Office has not found any evidence indicating knowing and willful violations.

4/ For the purpose of this report, the Committee's response filed by Mr. James Schoener on November 9, 1984, for the Committee and its treasurer is referred to as Committee's First Response. An additional response for these respondents filed on December 14, 1984, is noted as Committee's Second Response. Exhibits attached to that response are noted by the letter of the Exhibit. A response filed by Mr. Schoener on December 3, 1984, for other respondents who are also his clients is referred to as Response for Individuals. Other responses are noted using the specific name of the party who filed the response.

LEGAL ANALYSIS

I. APPARENT VIOLATIONS

1. The Committee's Failure to Report Outstanding Debts and Obligations

The Act requires committees to continuously report outstanding debts and obligations. 2 U.S.C. § 434(b)(8). The Committee is alleged to have failed to report its outstanding debts and obligations. Since the filing of its Statement of Organization in October 1983 until receiving the complaint in this matter, the Committee has never reported a single debt. Instead, the Committee's reports have either left blank the provided space for debts or have indicated a zero balance was owed. Additionally, Schedules D, itemizing individual debts, have never been filed with any of these individual reports.

The Committee now admits it did indeed have debts and obligations after May 5, 1984, the date of the primary election. Committee's First Response at 1. Amendments to the 1984 July and October Quarterly Reports and the Pre-Primary Report have been filed showing the Committee's outstanding debts and obligations during these periods. Schedules D, itemizing debts owed and payments made, have also been filed with each of these reports.

The Committee offers two explanations for failing to report its primary debts. First, the Committee states it did not so because "the amounts [of these debts] were as yet unliquidated, undocumented, and/or unknown". Committee's Second Response at 4. Additionally, the Committee admits that it failed "to have indicated the primary debts to the extent such debts were known." Id.

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This apparent inconsistency is explained in an affidavit attached to the Committee's Second Response by John Baxter, the Committee's treasurer. He admits reviewing (but not preparing) 5/ the Committee's 1984 July and October Quarterly Reports and "assumed" that only overdue debts and obligations had to be reported. 6/

In an effort to prove the existence and size of the newly reported primary debt, the Committee has provided the Commission with copies of checks issued to pay primary debts, as well as copies of its outstanding invoices to date. The Committee has added its paid and unpaid primary expenses for May through October 1984. This sum has been subtracted from the Committee's cash-on-hand as of May 6, 1984 with a negative figure (the primary debt) resulting.

The Office of the General Counsel has two initial reservations regarding the reliability of this method of establishing the primary debt. First, it is unclear whether the Committee paid vendors used for both primary and general elections services using separate checks for each election.

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5/ Ruth Cymber, the assistant treasurer of the Committee prepared the Committee's reports. It is unknown whether she labored under the same misconception regarding the definition of a debt.

6/ Although the Committee claims that it did not understand how to report such debts, it assured potential contributors after the date of the primary that the Committee did have a primary debt. See e.g. Response of Tennaco Employees Good Government Fund at 2; Response of Robert Lowdon at 1; Response of the American Banking Association BankPAC at 1; Response of National Association of Home Builders BUILD Political Action Committee at 2.

Unless this was the case, the Committee's method of proving its primary debt by providing copies of its cancelled checks would appear to be unreliable since a mixing of the disbursements towards the separate elections would occur.

Additionally, comparing the Committee's previously reported disbursements towards its primary debts (Schedules B to the reports) and the cancelled checks provided by the Committee, it appears the Committee has not provided cancelled checks for all of its previously reported paid primary disbursements. For example, the 1984 July Quarterly initially reported on Schedule B a $150,000 disbursement to Black, Manafort & Stone on May 7, 1984, for a primary obligation. Other disbursements on Schedule B to this vendor for primary obligations were reported on April 16, and June 22, 1984. The newly filed Schedule D to this report now state a $11,613.06 payment was made during this period. Yet, the Committee has provided cancelled checks of only slightly over $5,000 to this vendor.

Copies of cancelled checks for other disbursements after May 6, 1984, for primary debts noted on the July 1984 Quarterly Report are also not included in the Committee's Exhibit C. These include disbursements made to Carpet Services Inc., Century Aircraft Corporation, Arthur Goldblum Investments, and the United States Postmaster. Additionally, in the 1984 October Quarterly Report first filed with the Commission, the Committee reported disbursements towards a primary bill owed to Miller, Canfield, Paddock & Stone and the Texas Employment Commission. Cancelled checks evidencing these debts have not been provided. It is

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unknown whether the Committee initially misreported such disbursements as toward the primary election. If not, it appears the amount of the newly established primary debt is inaccurate.

Admitting its failure to report the primary debt, the Committee requests to enter into pre-probable cause conciliation. The Office of the General Counsel recommends that the Commission reject this request at this time for three reasons.

First, the Committee has not amended all of its reports to consistently report its outstanding debts and obligations. Only the 1984 April and October Quarterly Reports and the 1984 Pre-General Report have been amended to indicate the Committee's outstanding debts. The Committee has still not reported its outstanding debts and obligations for the 1983 Year End, 1984 April Quarterly and 1984 Pre-primary Reports. Second, the accuracy of the newly reports debts cannot be assessed. More importantly, as will be discussed further, a host of other reporting violations are contained in all of these reports that the Committee has not addressed in its responses. Therefore, this Office recommends that the Commission find reason to believe the Committee has violated 2 U.S.C. § 434(b)(8) and complete an investigation. Upon completion of this investigation, the Committee's request for pre-probable cause conciliation will be re-evaluated.

2. The Committee's Failure to Report Expenditures

Upon review of the Committee's checks submitted to prove a primary debt, other reporting violations become apparent. The Act requires that expenditures exceeding $200 be separately

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itemized and include the identity of the person paid, the date, amount, and purpose of the expenditure. 2 U.S.C. § 434(b)(5)(A). "Identification" of a person is defined as the listing of that person's full name and address. 2 U.S.C. § 431(13)(B). Comparing the checks said to be used to pay the primary debt with reported disbursements on Schedules B, as shown below, it appears the Committee has not properly itemized these checks as disbursements on Schedules B.

The Committee's checks indicate a payment of $1,137.65 to Southwestern Bell of Dallas, Texas on May 7, 1984. This disbursement is listed on Schedule B of the 1984 July Quarterly Report as $2,833.64. Checks totalling $1,807.44 for telephone service in San Antonio were also attached to the Committee's Response. Schedule B reported this payment as $1,952.44. A check for $439.60 dated May 7, 1984, written to the 1800 Plaza Partnership is listed on Schedule B on that date as a primary disbursement of $1,199.80. A check dated May 14, 1984, for $374.75 to Dot McCalpin is listed on Schedule B as having been made on June 4, 1984. Two different addresses were reported for a single disbursement made to the Republican Party of Nuces County, Texas. The check lists a Corpus Christi address. Schedule B lists this address as Austin, Texas.

Problems are presented by the Committee's disbursements to Delta Airlines. A May 3, 1984, check stub lists a credit card payment of $504 to Delta Airlines. Schedule B has no listing

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for a disbursement to Delta Airlines on that date. A similar itemization stub dated June 4, 1984, indicates Delta received $169; Schedule B lists this amount as $60. Similarly, another itemization on June 4, 1984, indicates payment of check #2216 to the American Express Company for $1,643. The full itemization of this amount is not apparent on Schedule B.

Additional problems remain with other disbursements. A check for $1,242 written on June 22, 1984, to the I Love America Committee is not listed on Schedule B. A check for $226.35 written on October 11, 1984, to the Committee from the "Transfer balance in Telephone Deposit Account to General" does not appear on Schedule B of the 1984 Pre-General Report. A copy of a check for $750 written on October 17, 1984, to Michael Sterlacci is not included on Schedule B (although the Committee's newly supplied amendments do list this amount on Schedule D as a disbursement).

The Committee is required to report and itemize all of its disbursements exceeding $200. In several instances it has either not done so or has provided incorrect information. Therefore, this Office recommends that the Commission find reason to believe the Committee and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(5)(A). 7/

7/ The General Counsel's Factual and Legal Analysis provided to the Committee discusses this violation and all violations not directly raised in the complaint.

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3. Joint Fundraising Violations

Responses received by this Office indicate the Committee was engaged in joint fundraising activity. This information has been received from individual respondents such as Mr. Jerry Freeman who understood that his contribution to the Committee would be distributed 2/3 to the Committee and the other 1/3 to President Reagan and the National Republican Party. Freeman Response at 1. At least one response on the Committee's letterhead indicates proceeds from a Presidential Nomination Breakfast Ball would be distributed 2/3 to the Committee; 1/6 to the Texas Victory Committee, and 1/6 to the Republican Host Committee. Response for Individuals at Exhibit L. Neither of these other two committees appear to be listed with the FEC. Other responses indicate the Committee was engaged in joint fundraising, but did not discuss the distribution of proceeds. 8/ The checks provided by other respondents indicate checks reported as received by the Gramm Committee were in fact made out to the "Presidential Nomination Breakfast Ball." 9/ Further, the Committee appears to have cashed these checks and reported all or most of the proceeds of the checks as contributions to the Committee. 10/At least one of the respondents was either unaware or uninformed that the candidate would receive some of the proceeds from the

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8/ See also Response of Louis A. Beecherl at 1; Response of N.M. Yost at Designation of Counsel Form.

9/ See Response of Bettye Nowlin at 1; Louis A. Beecherl at 3.

10/ See Response of Louis Beechel; Response of Karen Edwards at 1.

Nomination Breakfast Ball. 11/ The Response for Individuals also acknowledges a joint fundraiser was held. 12/

The Regulations impose requirements on joint fundraising activity. 11 C.F.R. § 102.17. Participating entities either must establish a separate committee or select one participating political committee to act as a fundraising representative. 11 C.F.R. § 102.17(a)(1)(i). All participants must enter into a written agreement. 11 C.F.R. § 102.17(c)(1). Every solicitation must include a notice stating the names of participating committees and the formula for allocating proceeds. 11 C.F.R. § 102.17(c)(2). A separate depository account must be established and each political committee must amend its Statement of Organization to name this account. 11 C.F.R. § 102.17(c)(3). All joint fundraising proceeds must be deposited into this account. 11 C.F.R. § 102.17(c)(3)(ii).

The Gramm Committee has apparently not met these requirements. First, it does not appear to have met the notice requirements for all of those solicited as indicated by the Response of Karen Edwards at 1. Second, it has not amended its Statement of Organization to include the name of a depository account established for the fundraising. 13/ Moreover, the Gramm Committee appears to have deposited these checks into the

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11/ See Response of Karen Edwards at 1.

12/ See Response for Individuals at Exhibit 0 (Bettye Nowlin); Id. at p. 5 (A. Patrick McEvoy); Id. (Robert E. Windom and wife).

13/ Because it is unknown what other committees participated in this joint fundraising, no recommendations are made. Neither the Texas Victory Committee nor the Republican Host Committee appear to be listed with the Commission.

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Committee's account instead of depositing them in a separate joint fundraising account as required. A review of reports does not appear to indicate how or when the Committee distributed these proceeds. Therefore, this Office recommends that the Commission find reason to believe the Committee is in violation of 11 C.F.R. § 102.17.

4. A Corporate Contribution

The Committee reported two contributions from Mr. M.N. Bostick on October 11, 1984, totaling $1,250. Of this sum, $250 was reported as being for the primary election and $1,000 was reported as being for the general election. In his response Mr. Bostick admitted these contributions, but stated there were not personal contributions, "but a political contribution by KWTX Broadcasting Company," a Texas Corporation. Mr. Bostick states he was fully reimbursed for the contribution by the corporation.

The Act prohibits a corporation from contributing to a federal election from its general funds. 2 U.S.C. § 441b. Similarly, Committees are prohibited from knowingly accepting such contributions. Id. Additionally, the Act prohibits persons from making and committees from accepting contributions made in the name of another. 2 U.S.C. § 441f. The Act also prohibits a person from knowingly permitting his name to be used to effect such a contribution. Id. The KMTX Company was the source of the contribution. Mr. Bostick permitted his name to be used to conceal this fact. Therefore, this Office recommends the

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Commission find reason to believe the KMTX Corporation violated 2 U.S.C. §§ 441b and 441f, and that Mr. Bostick violated 2 U.S.C. § 441f. 14/ Because there has been no showing that the Committee was aware of the facts surrounding the making of this corporate contribution, at this time this Office recommends that the Commission find no reason to believe the Committee has violated 2 U.S.C. § 441f or § 441b.

5. Facially Excessive Contributions

The Committee's reports indicate it has received excessive contributions. The Act establishes a $1,000 contribution limitation per person per election. 2 U.S.C. § 441a(a)(1)(A). Unauthorized political committees are limited to $5,000 per election. 2 U.S.C. § 441a(a)(2)(C). An election is defined to include general, special, primary or runoff elections. 2 U.S.C. § 431(1)(A). Committees are prohibited from knowingly accepting contributions exceeding the Act's limitations. 2 U.S.C. § 441a(f). We show below the Committee has reported receiving facially excessive contributions.

Mr. Gene Canavan is reported as having made two $1,000 contributions to the general election on July 17, 1984. Although Mr. Canavan is represented by Mr. Schoener, the Response for Individuals does not address this problem.

14/ A General Counsel's Factual and Legal Analysis for Mr. Bostick is attached for Commission approval.

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Another apparent excessive contribution from Mr. Robert Lowdon was reported. On the Committee's October Quarterly Report, Mr. Lowdon is reported as contributing $1,000 to the primary on July 12, 1984, and $500 to the general election on August 15, 1984. A review of the Committee's 1984 Pre-primary Report indicates an additional $1,000 contribution by Mr. Lowdon to the general election on October 2, 1984. Responding to notification, Mr. Lowdon indicated these contributions were from his spouse and himself, asserting they had given only $2,500 of the $4,000 maximum permitted contribution. 15/ The Committee reported all of these contributions in Mr. Lowdon's name. The Committee's amendments have not corrected this problem; an excessive contribution is still apparent from the face of the reports.

Three $1,000 contributions have been reported from Mrs. H.B. Zachry on July 17, 1984. Two were reported as designated for the general election; the other was reported for the primary. Although Mrs. Zachry is represented by Counsel for the Individual Respondents, this apparently excessive contribution has not been addressed in amendments nor explained.

As the above discussion indicates, the Committee reported receiving contributions exceeding the Act's limitations on several occasions. The Act prohibits this. Therefore, this Office recommends that the Commission find reason to believe the Committee has violated 2 U.S.C. § 441a(f).

15/ As discussed in Part II, this assertion apparently typifies advice given by the Committee regarding spousal, primary, and general elections contributions.

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6. Failure to Correctly Report Contribution Information

The Act requires itemization of all contributions exceeding $200. 2 U.S.C. § 434(b)(3)(A). Such itemization must include the identity of the contributor and the date and amount of the contribution. Id. The Act defines identification of an individual as listing the name, address, occupation and employer of that individual. 2 U.S.C. § 431(13)(A). As illustrated below, the Committee has failed to meet these requirements.

The Committee has incorrectly reported identities of contributors. In the 1984 Pre-primary Report the Committee reported two $1,000 contributions from Mr. B.S. Baker, listing his occupation as "U.S. Marshall." The Response for Individuals indicates Mrs. Baker, not Mr. Baker, made these contributions and enclosed a copy of a properly designated check showing Mrs. Baker as the source of the contribution. The Committee's amendments do not reflect this change in identity. Moreover, Mr. Baker's name, rather than Mrs. Baker's, continues to be noted in Exhibit B of the Committee's revised list of primary contributions.

On its 1984 October Quarterly Report the Committee reported two $1,000 contributions from Mr. Gene Overbeck. Mr. Overbeck denies making any personal contributions to the Committee. Instead, he attributes the confusion surrounding his "contributions" to the fact that he is chairperson of the American Airlines Political Action Committee which made $2,500 in contributions to the Committee in August 1984 in the context of a

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joint fundraiser. The revised list of primary contributors continues to attribute incorrectly a primary contribution by Mr. Overbeck. 16/

The Committee also incorrectly identified contributions from members of the Parker family. The 1984 October Quarterly reported two $100 primary contributions from Daniel Parker on September 20, 1984. This same individual was reported as contributing $1,000 on September 27, 1984, to the general election. The Response for Individuals notes these contributions were misreported because the identities of Daniel R. Parker, Daniel T. Parker, and William R. Parker were confused. Mr. Daniel T. Parker is the notified respondent. Exhibit B to the Committee's Second Response lists a $100 primary contribution attributed to Daniel T. Parker on September 20, 1984; however, the Response for Individuals states Mr. Daniel T. Parker made two contributions totaling only $25 in April and September, 1984. Daniel R. Parker is said to have made several contributions totalling around $500. William R. Parker is said to have made a $1,000 contribution. Response for Individuals at 5. Although this response indicates "confusion over the similarity of names should be corrected"; to date the Committee has not done so.

The Committee also reported two $1,000 contributions from Mr. G.W. Sanford during October, 1984. Equal sums were reported for the primary and general elections. Responding to

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16/ See Part II regarding the primary/general election distinction made by the Committee in accepting Mr. Overbeck's contribution.

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notification, Mr. Sanford indicates he made only one $1,000 contribution on October 1, 1984. His spouse made a contribution for an identical amount the same day. Each wrote an individual check to the Committee. Because these contributions were made after the date of the primary and there is no evidence of written designations for the primary, the Committee has incorrectly listed Mr. Sanford's name with its primary contributors. Moreover, the Committee has not indicated Mrs. Sanford's contribution to the general election. 17/ The Response for Individuals indicates a similar problem arose in reporting the contributions of Mr. Peter Gill. See Response for Individuals at 4.

A similar problem is presented by a contribution reportedly made by Mr. Arthur Seeligson III. The Committee reported receiving two $1,000 contributions from Mr. Seeligson on July 17, 1984; one contribution to the primary and the other to the general election. Denying contributing this sum, Mr. Seeligson admits making a $1,000 contribution on July 3, 1984. An enclosed copy of this check does not contain a designation for the primary election. Because of the date of this check, this contribution should have been attributed to general election. Mr. Seeligson's name still is listed with the Committee's primary contributors and still is listed as contributing $2,000 rather than $1,000.

Mr. Ross Workman reportedly contributed $1,050 to the Committee on October 9, 1984. The Committee reported receiving $1,000 for the general election and the rest for the primary

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17/ See Part II regarding the primary/general election distinction made by the Committee in accepting this contribution.

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election. Responding to notification, Mr. Workman denies making any personal contributions to the Committee. Instead, Transco Energy Company's political action committee is the source of this contribution as illustrated by the check attached to the response. Amendments to the Committee's Pre-primary Report still indicate that Mr. Workman, not Transco PAC, made these contributions.

Compounding these problems, the Committee has apparently incorrectly reported the dates of several contributions. For example, Mr. William Burford states that he contributed to the Committee on June 30, 1984. The Committee reported the date of this contribution as August 23, 1984. Amendments to the 1984 October Quarterly do not correct this error.

The Committee reported a $2,000 contribution ($1,000 for the primary; $1,000 to the general) on September 24, 1984 from Mr. Thomas Hartin. 18/ Mr. Hartin's own response indicates that he made a $3,000 contribution to the Nomination Breakfast Ball on August 22, 1984. The Response for Individuals States that "this amount was misreported from the joint fundraiser." Id. at 4.

This raises several additional problems. If Mr. Hartin did, as he states, make a $3,000 contribution, such contribution would be excessive. Even if the contribution was for $2,000, it is still excessive because it was received after the primary and there is no indication that Mr. Hartin designated any portion of it to the primary. Consequently, the entire $2,000 must be

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18/ Mr. Hartin's contribution is further discussed in context of joint fundraising problems.

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applied to the general election. See 11 C.F.R. § 110.1(a)(2). Similarly, the committee's reporting of the contribution as being $1,000 for the primary and $1,000 for the general is also improper.

Mr. Don Lummus made a $1,000 contribution to the general election on July 23, 1984. The Committee reported the contribution date of this amount as September 24, 1984. 19/

The National Association of Homebuilders indicated in its response to the complaint that it made a primary contribution on May 21, 1984. The Committee reported this contribution date as July 31, 1984.

In addition, the Committee has incorrectly reported amounts from individual contributors. The Committee reported a contribution totalling $1,700 from Mrs. Andrew Fasken on October 10, 1984. Of this, $1,000 was reported as designated for the general election and $700 reported designated for the primary with a yearly aggregate of $1,900. The Response for Individuals indicates the yearly aggregate was "misreported" as Mrs. Fasken made only a $1,700 contribution to the Committee that date. Response for Individual at 3. However, the Committee has not amended its reports to correct this erroneous aggregate amount.

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19/ See Part One, at note 20, discussing the Committee's reporting of this contribution.

The Committee reported receiving a $500 primary contribution on July 2, 1984, and a $1,000 general contribution on August 15, 1984, from R.L. Foree. The reported yearly aggregate was listed as $2,000. The Response for Individuals asserts Mr. Foree and his spouse (a non-respondent) each made respective contributions to the primary and general elections of $750 and $1,000. Amendments to the 1984 July Quarterly do not reflect this assertion. Instead, they note Mr. Foree making $1,000 contributions to both the general and primary elections on July 2, 1984. Mrs. Foree is reported making a $1,000 contribution to the general election on August 15, 1984. Mrs. Foree's name cannot be located with the list of primary contributors in Exhibit B.

The Committee reported two contributions aggregating $1,500 from Anita Rogers. Both of these were reported as received on October 1, 1984 and were said to be designated as $500 for the primary and $1,000 for the general election. Responding to notification, Mrs. Rogers denies ever making any contribution whatsoever to the Gramm Committee. Exhibit B to the Committee's Second Response still lists Mrs. Rodgers as a contributor to the primary. 20/

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20/ Part Two discusses in the context of improper designations, the Committee's reporting a single $1,000 contribution as $1,000 contribution to both the primary and general elections. The contributions of Mr. Gilbert Denman, Mrs. Joan Kunitz, Mr. Don Lummus, Ms. Paige Pickens, and Ms. Anne Pickens were reported in such a manner. The amounts of these contributions also have been misreported.

The Committee has amended other reports, removing reference to facially excessive contributions. For example, the Committee's original reports indicated the National Association of Builders ("BUILDPAC") made three contributions to the general election; a $500 contribution on September 20, 1984; a $5,000 contribution on October 12, 1984; and a $5,000 contribution on July 31, 1984. Additionally, the Committee reported a $5,000 primary contribution also made on July 31, 1984. 21/ BUILDPAC denies making the $500 contribution, further stating it gave only $10,000 to the Committee. The Committee has amended its reports, showing a $5,000 contribution to the general election on October 10, 1984, with a reported yearly aggregate of $10,000 in contributions. The Committee has apparently deleted without explanation references to the $500 contribution and the $5,000 contribution to the general election reported on July 31, 1984. It is unknown whether the Committee has adjusted its cash-on-hand to reflect this change.

Moreover, the Committee originally reported that Mr. David Crowley made $1,000 primary contribution on May 9, 1984. On September 24, 1984, he is reported as making a $500 primary contribution. The Committee also reported a $1,000 contribution from Mr. Crowley on June 6, 1984, for the general election.

21/ The late reporting of these contributions is discussed in Part One, page 18.

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The Committee's amendments restate that Mr. Crowley made the $1,000 general election contribution on June 6, 1984. Further amendments to the 1984 October Quarterly Report indicate Mr. Crowley made a $500 contribution to the primary on September 24, 1984. Exhibit B does not note the May primary contribution.

The Committee's 1984 October Quarterly Report noted two $1,000 contribution to the general election on September 24, 1984, from Mr. Michael Hutchison. Mr. Hutchison's response indicates these contributions were to be equally divided between the primary and general elections. Amending its reports, the Committee now lists Mr. Hutchison with its primary contributors as making a $1,000 contribution on September 24, 1984. Other than Mr. Hutchison's statement, no evidence has been provided regarding whether this contribution was properly designated for the primary.

The National Federation of Independent Business ("NFIB") was reported by the Committee as making a $3,000 contribution to the primary July 25, 1984, and a $4,000 contribution to the general election on November 10, 1984, with a yearly aggregate of $8,000. NFIB states it made the maximum permitted contribution. According to NFIB, the dates of these primary contributions were September 17, 1983 ($1,000), March 12, 1984 ($1,000), July 12, 1984 ($2,500), and October 9, 1984 ($500). The dates of these general contributions were July 12, 1984 ($500), September 7, 1984 ($4,000) and September 10, 1984 ($500).

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In addition to all of these other problems, the Committee has inconsistently reported information despite its amendments. For example, the Committee's original 1984 October Quarterly Report states that Mr. Arthur Cary contributed $500 to the primary on July 23, 1984 and $1,000 to the general election on Septemeber 24, 1984. On page 16 of Exhibit B to the Committee's Second Response listing all primary contributors, Mr. Cary is said to have made a $500 contribution to the election on July 23, 1984. Amendments to the 1984 October Quarterly Report, however, indicate Mr. Cary made a $1,000 primary contribution a July 23, 1984, as well as the $1,000 September primary contribution.

The Committee also has failed to correctly report and amend its reports regarding contributions by William Martin. The complaint alleges (and the Committee reported) Mr. Martin made two $1,000 contributions on July 30 1984. The Response for Individuals indicates Mr. Martin made a $1,000 primary contribution on December 7, 1983, and a general election contribution on July 23, 1984. Despite this assertion by his own counsel, amendments to the 1984 October Quarterly Report still indicate that Mr. Martin made two $1,000 contributions to the general and primary elections on July 30, 1984. 22/

The Committee has also reported two contributions from Mr. Doug Conlee consisting of $1,000 for the primary and $100 for the general election. Both have been reportedly received on October 9, 1984. Counsel for the Committee states this $100

22/ The designation status of Mrs. Martin's contribution are discussed in part II.

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contribution may have been from Mr. Conlee's brother; however, the Committee has not amended the report to remove the second contribution from Mr. Conlee's name.

The Committee is required to report the identify of persons contributing $200 or more. The Committee has failed to do so correctly. The Committee is required to report the dates and amounts of contributions. It has not done so correctly or consistently. Therefore, this Office recommends that the Commission find reason to believe that the Committee has violated 2 U.S.C. § 434(b)(3)(A).

II. DESIGNATION PROBLEMS

The Committee's Reports are replete with instances where the Committee has improperly reported designations of contributions. Two patterns of misreporting have come to light. In one pattern the Committee reported receiving primary and general contributions from an individual. Responses indicate that the contributions were intended as a joint contribution from a married couple. In the other pattern, the Committee reported general and primary contributions from an individual. Responses indicate only a single undesignated contribution was made. Two reporting problems are implicated by the Committee's reporting of such contributions.

The first concern addresses the Committee's designation of a $2,000 contribution received after the date of the primary election as two $1,000 contributions, one for the general

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election and the other for the primary. The Regulations permit primary contributions after the date of the primary under specific circumstances. A key requirement is that the contribution must be designated in writing as a primary contribution. A committee may accept such a contribution only to the extent it has net debts outstanding from the primary. 11 C.F.R. § 110.1(a)(2)(i). 23/ An attempt to make a primary contribution after the date of the primary without a written designation results in a contribution made to the general election. 11 C.F.R. § 110.1(a)(2)(ii)(B). Accordingly, undesignated contributions made after the date of the primary by persons already contributing the maximum amount permitted to the general election results in an excessive contribution.

Additionally, addressing spousal contributions, the Regulations state that contributions or payments made by a married individual shall not be attributable to that individual's spouse unless specified by that individual or that individual's spouse. 11 C.F.R. § 100.7(c). Consequently, a contribution from a married person on a check drawn on a joint checking account is not an indication of a spousal contribution absent such a designation. As shown below, the Committee's reporting of these

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23/ For the purpose of this discussion, the Office of the Geneal Counsel assumes the accuracy of the Committee's amended reports indicating a primary debt. Therefore, the question of whether the Committee had net debts outstanding need not be addressed. See AO 1984-32. It is recognized the question of a net primary debt may need to be discussed at the completion of the recommended audit.

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two types of contributions have been characterized by inconsistencies and inaccuracies.

1. Designation of Two Contributions by Two Individuals (non-spousal) as Two Contrbituions by One Individual

The Committee reported receiving two contributions of $1,000 for the primary and general elections in September 20, 1984, from W. Allen Custard. Responses indicate two individuals, father and son, were the sources of these contributions. Copies of two cancelled checks provided by Mr. W. Allen Custard do not designate a primary contribution by either respondent. Nevertheless, Mr. W. Allen Custard's name continues to be included with the Committee's list of primary contributions. The Committee has never indicated it received a contribution from Mr. Custard's father.

Similarly, the Committee indicated receiving two $1,000 contributions to the general and primary elections respectively on August 2, 1984, from "Mr. Montana McKean." Responses indicate that these contributions were from two individuals, Mrs. Montana McKean and her son, John Bryan McKean. Copies of provided cancelled checks reveal each made a $1,000 contribution to the Committee. Neither check indicated a primary contribution was intended. Despite this, Montana McKean's name continues to be listed with the primary contributors. The Committee has never indicated it received a contribution from John Bryan McKean.

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2. Designation of Two Individual Contributions by Spouses as Two Contributions by Husband

The Committee's Reports show a consistent pattern of reporting two individual contributions from a married couple as a primary and a general contribution from the husband. For example, the Committee reported two $1,000 contribution from Mr. Thomas Benson on October 9, 1984. One is reported as a primary contribution, the other as a general contribution. Mr. Benson denies making these dual contributions. Instead, Mr. and Mrs. Benson are said to be the source of these contributions. The Benson's enclosed check notes "Donation from Mr. and Mrs. Thomas Benson", thus meeting the requirements for attributing the contribution to both spouses. There is nothing on the face of the check or any other evidence indicating a contribution to the primary election was intended. Therefore, this contribution should have been credited one half to each spouse for the general election. Nevertheless, the Committee continues to list Mr. Benson with its primary contributors and as the source of both contributions.

A $1,000 contribution to the general election was reported by the Committee on August 23, 1984, from Mr. William Burford. This individual is also reported as making a $1,000 primary contribution on the same day. Responding to notification, Mr. Burford denies making two contributions. Instead, he asserts his spouse and he each made a $1,000 contribution. Response of William Burford at 1. Because Mr. Burford has not provided

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copies of his cancelled checks, it is unknown whether the contribution indicated his intent that one half be attributed to Mr. Burford and one half to his wife (Mr. Burford appears to assume that a marriage one day prior to the writing of a $2,000 check as sufficient for the purpose of evidencing intent of a joint contribution.) Id. In any event, Mr. Burford's assertion that he and his wife contributed precludes the Committee's finding contributions from the primary and general elections from Mr. Burford. Nevertheless, amendments to the 1984 October Quarterly Report continue to list Mr. Burford as contributing to both of these elections.

Additionally, Mr. Hugh Halff is reported making two $1,000 contributions on July 17, 1984, one to the primary and one to the general election. Mr. Halff indicates he made a $1,000 contribution on June 26, 1984. The other contribution reported in his name on the same date is said to be from his spouse. Attaching a copy of their check stub to their response, Mr. and Mrs. Halff indicate a joint contribution was intended and have attested to this fact. Although, this Office does not have a copy of their cancelled check, it is unlikely that designations for the primary and general elections appeared on the face of the check or on any other document. Nevertheless, the Committee continues to list Mr. Halff as making a primary contribution on that date and as the source of both contributions.

Moreover, the Committee lists Mr. Willard Hammonds as contributing $1,000 to both the general and primary elections on

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September 24, 1984. Denying he made two contributions, Mr. Hammonds asserts he and his spouse each made a $1,000 contribution on that date. An enclosed cancelled check supports this contention as both parties names appear in the area used for indicating the purpose of the check. The check does not contain a designation for the primary election. Despite this, the Committee continues to list Mr. Hammonds' name among its primary contributors and as the source of both contributions.

The Committee reported two $1,000 contributions from Mr. G.W. Sanford on October 15, 1984. One of these was said to be for the primary, the other for the general election. Mr. Sanford denies making two contributions. Instead, he has provided this Office with copies of two $1,000 checks to the Gramm Committee drawn on the account of "Mr. or Mrs. G.W. Sanford". One of these checks is signed by Mr. Sanford. The other is signed by Mrs. Sanford. Neither note a designation to a particular election. Nevertheless, the Committee continues to report Mr. Sanford as the source of the primary and general contributions.

The Committee's October Quarterly Report states Mr. Louis Beecherl made two $1,000 contributions to the general election on September 24, 1984. Amending this Report, the Committee now indicates Mr. Beecherl made primary and general election contributions on that date. Responding to notification, Mr. Beecherl states he made a primary contribution to the Committee on March 3, 1984. Additionally, he presented the Gramm Committee

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with a $1,500 check on August 8, 1984, for the Presidential Nomination Breakfast Ball. Mrs. Beecherl made identical contributions of the same amounts to these payees on the same date. The enclosed copies of these four checks (two drawn on Mr. Beecherl's account, two drawn on Mrs. Beecherl's account) do not make any notation of a designation for a particular election. Despite this, the Committee continues to list Mr. Beerchel with its August primary contributions and as the source of contributions to the general and primary election on August 8, 1984.

Mr. Robert Lowdon is reported as making a $1,000 primary contribution on July 12, 1984, a $500 general election contribution on August 15, 1984, and a $1,000 contribution on October 2, 1984. Although all of these contributions have been attributed to Mr. Lowdon, he has indicated they were also from his spouse. The Response of Mr. Lowdon notes that the net indebtness of the Gramm Committee after the primary lead to the result that "...Mr. Lowdon and his wife were authorized by law to contribute a total of $4,000 to Mr. Gramm's Campaign. Since they have contributed only a total of $2,500, their contributions are not in violation of applicable federal law." Response of Robert Lowdon at 1. The Committee has not amended its reports in light of this facility excessive contribution. No evidence of the Lowden's intent concerning the attribution of their contributions to a particular election has been provided.

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The Committee incorrectly reported contributions from Mr. and Mrs. Robert Bradley. The Committee's 1984 October Quarterly Report indicates two general election contributions of $1,000 each from Mr. Bradley. The first of these was reported as being made on June 25, 1984, the second on August 13, 1984. Responding to notification, Mr. Bradley admits he initially made both contributions. Because he thought he could contribute only $1,000 to the Committee, he later communicated through third parties to the Committee that this contribution should be attributed to his spouse. Affidavits attached to the response indicate the Committee was informed of this redesignation. Despite this knowledge, and despite a lack of an election designation on either check, the Committee has amended its 1984 Pre-primary Report to show Mr. Bradley as making a primary contribution on August 13, 1984. Mrs. Bradley's name does not appear on the public record.

Similarly, the Committee reported receiving two $1,000 contributions on September 19, 1984, from Robert L. Trimble. One of these was reported as a primary contribution, the other for the general election. Mr. Trimble denies making two contributions; instead he states a $2,000 check given to the Committee was intended as a joint contribution from Mr. Trimble and his spouse. Mr. Trimble also has enclosed a cover letter to the Committee noting the contribution as a joint one. Although this check contained no designation for any particular election,

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the Committee's amendments to the 1984 October Quarterly Report continue to list Mr. Trimble as the sole source of the contributions to the primary and general elections.

Finally, the Committee reported two $1,000 contributions from Mr. Ernest Fay. Responding to notification, Mr. Fay indicates a joint spousal contribution was intended. Because no copy of a cancelled check has been provided, it is unknown whether this contribution was properly designated. Nevertheless, Mr. Fay continues to be reported as the source of both contributions. The same situation is presented by a contribution of Mr. Clifton Overcash.

3. Designations of Contributions by an Individual as for the General and Primary Elections without designation.

The Committee has also reported $2,000 in contributions as contributions for both the general and primary elections despite a lack of designation. For example, Mrs. Karen Martin is reported making two $1,000 contributions on August 9, 1984. Responding to notification, Mrs. Martin has provided a copy of her cancelled check for $2,000. Response for Individuals at M-2. It contains no designation for a particular election. Mrs. Martin's name continues to be listed with the primary contributors. Apparently, the Committee merely instructed contributors that individuals could contribute up to $2,000 to the candidate without explaining the need for designation. See Response of L.D. Burns at 1.

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4. Double Reporting Problems

The Committee's Reports indicate many instances where a single undesignated contribution of $1,000 made after the date of the primary has been reported as a $1,000 contribution to each election. 24/ For example, the Committee reported two from Mr. Gilbert Denman on July 17, 1984. Mr. Denman specifically denies making a primary contribution to the candidate since he supported the candidate's opponent in that race. Instead, he indicates he made a single $1,000 contribution to the general election on June 26, 1984. This check contains no election designation. Although Mr. Shoener is counsel for this respondent, Mr. Denman's name still appears with the list of primary contributors and as a source of a general election contribution.

A similar situation is presented by contributions from Robert and Margaret Folson. Mrs. Folsom is reported making a $1,000 primary contribution on July 11, 1984. On September 24, 1984, Mr. Folsom was reported contributing $1,000 to both elections, while Mrs. Folsom was reported making a $1,000 general contribution. The Folsons deny this, stating they made a single $2,000 joint contribution on July 8, 1984, as well as a $100 contribution in February, 1983.

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24/ As previously noted, reporting the incorrect amounts of such contributions may also be found to be a violation of 2 U.S.C. § 434(b)(3)(A). See footnote 20, supra.

A copy of the former contribution check does not note a designation for a particular election. Additionally, there is no indication from the face of this check that a joint spousal contribution was intended. Although the Fulsons are represented by Mr. Schoener, the Committee continues to incorrectly list both Mr. and Mrs. Folsom with their primary contributors. Additionally, the public records still lists both as making general election contributions.

A similar problem stems from the Committee's report of $1,000 contributions to the general and primary elections from Mrs. Joan Kunitz. The 1984 October Quarterly Report notes these as made on September 4 and 24, 1984. Mrs. Kunitz states she made but a single contribution on September 4, 1984. Kunitz Response at 1. It is unknown whether Mrs. Kunitz designated her contribution for the primary. Her attorney, Mr. Schoener, states this contribution was "misreported and will be corrected." Response for Individuals at 4. To date, Mrs. Kunitz's name continues to be listed with the Committee's primary contributors. Moreover, her name continues to appear on the public record as making a general election contribution.

A $1,000 contribution from A.D. Lummuns has also been reported two times by the Committee. The 1984 October Quarterly Report notes Mr. Lummuns making two $1,000 contributions on September 24, 1984, one contribution for the primary the other for the general election. Mr. Lummuns has informed this Office that he made only one contribution on that date, although noting

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he made a $1,000 primary contribution on November 30, 1983. To date, the Committee continues to list Mr. Lummuns as making a September 1984 primary contribution. Moreover, Mr. Lummuns' name appears on the public record as having made two $1,000 contributions to the primary election.

The Committee reported Mr. William Martin making $1,000 contributions to the general and primary elections on July 30, 1984. The Response for Individuals indicates Mr. Martin made but a single contribution on that date, although be made an earlier $1,000 contribution in December, 1983. Neither of the provided copies of the cancelled checks noted a designation for a particular election. Response for Individuals at 4 and at Exhibits M-1. Despite this, Mr. Martin's name continues to be listed with the primary contributions made on July 30, 1984, as listed on Exhibit B. Moreover, his name still appears on the public record as making $1,000 general election contributions in December 1983 and July 1984.

Ms. Paige and Anne Pickens are each reported by the Committee as making two $1,000 contributions on July 30, 1984. Each was reported as making a primary and general election contribution of $1,000. Responding to notification, these respondents assert they each made only one contribution to the Gramm Committee on July 12, 1984. Copies of their cancelled checks do not include a designation for a particular election. The Committee continues to list both of these respondents with

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its primary contributors. Additionally, their names still appear on the public record as making general election contributions of $1,000 each.

Mr. John White is reported by the Committee as making two $1,000 contributions on July 17, 1984. One of these was reported as a primary contribution, the other was reported as for the general election. Denying this, Mr. White admits making a single $1,000 contribution on that date, further indicating the contribution was intended to be a joint one from Mr. White and his spouse. Mr. White states the contribution was probably accompanied by a notation indicating a joint contribution was intended. Response of John White at 1. To date, the Committee continues to report Mr. White as the source of two $1,000 contributions.

From the above discussion it is apparent the Committee has not met the Regulations requirements for accepting either spousal contributions or primary contributions after the date of the primary. A contribution signed by one spouse and containing no designation that the contribution is intended to be from two individuals, is excessive to the extent it exceeds the permissible limitations for a single individual as set by the Act. See 11 C.F.R. § 100.7(c). Additionally, a contribution after the date of the primary which does not designate a primary contribution is intended, is therefore a contribution to the

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general election. See 11 C.F.R. § 110.1(a)(2). Thus, an excessive contribution results when a contribution as made by an individual after the date of the primary without proper designation when this contribution (or the yearly aggregate) exceeds $1,000.

Notwithstanding the possibility that excessive contributions have been made to the committee by some of the respondents, this Office recommends the Commission take no action with respect to these respondents. Four factors favor this result.

First, many of these respondents apparently made their contributions based on the advice of the Committee. It appears that individuals were informed that they could give $2,000 without regard to designations for elections. Additionally, it appears that married couples were informed that they could contribute $4,000 without designating elections or specifing a joint contribution. Other respondents contributed only after the committee had expressly assured them it had a primary debt. Secondly, because the Office of the General Counsel does not possess most of the checks of persons represented by Mr. Schoener, it is not possible to accurately determine which individuals did not properly designate their contributions. Finding excessive contributions against those who made improper designations would seem to be unfair to those who fully responded to the complaint by providing copies of their checks. It would also appear to reward those individuals who may have made improper designations but relied on the Committee's Response without providing additional information. Moreover, this result is consistent with

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other MURs where the overwhelming number of the possibly excessive contributions were less than $1,000 over the limits. 25/ Finially, in many cases it will be possible for the same individuals to simply make the identical contribution with a proper designation. 26/

Nevertheless, the Office of General Counsel recommends that the Commission find reason to believe that the Committee and its treasurer accepted excessive contributions in violation of 2 U.S.C. § 441a(f). Such a result is favored because the Committee improperly instructed the other respondents on the propriety of many of the contributions. Moreover, the Committee's has shown a flagrent disregard of the designation requirements of the Regulations.

III. NEED FOR AN AUDIT

The Office of the General Counsel recommends that the Commission refer the Gramm Committee for an audit. An audit is seen appropriate for the following reasons.

First, the Gramm Committee never reported a single debt or obligation until after receiving the complaint in this case. Although amendments have been made to reports filed after the primary, the 1983

25/ See MURs 1142/1255 and 1360.

26/ In addition to the previous discussion, many responses indicate individuals and groups contributions could not have resulted in violations of the Act because proof has been submitted that the contributions were properly designated. Therefore, the Office of the General Counsel recommends that the Commission find no reason to believe the following respondents have violated any sections of the Act: American Bankers Association, American Family PAC, Houston Industries Political Action Committee, Tennaco Employees Good Government Fund, Union Pacific Good Government Fund, Mr. John White, and Mrs. Peter O'Donnell. The same recommendation is also made for Mr. Albert B. Fay, Jr. who has only been reported making a $300 contribution.

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Year End Report, 1984 April Quarterly and Pre-Primary Reports still do not list the Committee's outstanding debts and obligations during those periods. Moreover, without such information it is impossible to accurately access the opening balances of debts reported in the amendments to the other reports. Further, this Office has expressed reservations about the accuracy of this debt as now reported. More importantly, a hard look should be taken at the accounts of a four million dollar campaign whose treasurer did not understand the definition of a debt.

Secondly, the Committee's reports are replete with reporting violations. The complaint in this case named 172 respondents, accounting for approximately $166,000 in contributions out of more than four million dollars in total contributions. Yet, examining even this small a sample of respondents (many of whom filled no information in response whatsoever) it was still possible to find accounting errors, improper designations, misidentifications, the reporting of wrong dates of contributions, contributions reported two times rather than once, excessive contributions, and persons reported as contributors who never made a contribution. Additionally, there appears to have been no accounting of proceeds from the Committee's joint fundraising activity. More importantly, these problems give rise to serious questions regarding the accounting methods used by the Committee (especially the Committee's seemingly arbitrary

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redesignation of primary and general contributions) and the overall accurary of reports based on this method. Based on the foregoing, the Office of the General Counsel recommends the Commission refer the Friends of Phil Gramm for an audit pursuant to 2 U.S.C. § 437g(a)(2).

RECOMMENDATIONS

1. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(8).

2. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(5)(A).

3. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(3)(A).

4. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 102.17.

5. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441a(f) by accepting facially excessive contributions.

6. Find reason to believe that M.N. Bostick violated 2 U.S.C. § 441f.

7. Find reason to believe KMTX Broadcasting Company violated 2 U.S.C. §§ 441b and 441f.

8. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441a(f) by improperly designating contributions.

9. Find no reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. §§ 441b and 441f.

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10. Reject the offer of the Friends of Phil Gramm and John Baxter, as treasurer, to enter into pre-probable cause conciliation at this time.

11. Refer the Friends of Phil Gramm and John Baxter, as treasurer, for an audit pursuant to 2 U.S.C. § 437g(a)(2).

12. Find no reason to believe the following respondents who properly designated their contributions are in violation of 2 U.S.C. § 441a(a)(1)(A) or 441a(a)(1)(C):

C. J. Allen
American Bankers Association
American Family PAC
Mr. Thomas Benson
Mr. Doug Conlee
Mr. W. Allen Custard
Mr. Gilbert Denman
Mrs. Andrew F. Fasken
Mr. Albert B. Fay, Jr.
Mr. Hugh Halff
Mr. Willard H. Hammonds
Houston Industries Political Action Committee
Mrs. Joan Kunitz
Mr. A. D. Lummus
Mrs. Montana McKean
National Association of Home Builders
National Federation of Independent Business
Mr. Gene Overbeck
Ms. Paige Pickens
Ms. Anne Pickens
Mrs. Anita Rogers
Mr. G. W. Sanford
Mr. Arthur Seeligson
Tennaco Employees Good Government Fund
Mr. Robert Trimble
Union Pacific Political Action Committee
Mr. John White
Mr. Ross Workman
Mr. B. S. Baker
Mr. William Martin
Mrs. Edith Jones O'Donnell
Mr. Daniel T. Parker

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13. Take no action with regard to the other respondents in this matter.

14. Approve the attached sample letters.

15. Approve the General Counsel's Factual and Legal Analyses.

Charles N. Steele
General Counsel

February 26, 1985
Date

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

Attachments

1. List of all Respondents
2. Committee's First Response
3. Committee's Second Response (including Exhibits)
4. Response for Individuals
5. Response of C.J. Allen (hereinafter listed by name of respondent only)
6. American Bankers Association Bank PAC
7. American Family PAC
8. Louis Beecherl
9. Tom Benson
10. M.N. Bostick
11. Robert L. Bradley
12. William E. Burford
13. L.D. Burns
14. Elloine M. Calder
15. W. Allen Custard
16. Karen Edwards
17. Albert E. Fay, Jr.
18. Ernest Fay
19. Margaret Folsom
20. Jerry Freeman
21. Hugh Halff, Jr.
22. W. H. Hammonds
23. Thomas E. Hartin
24. Houston Industries Political Action Committee
25. Michael D. Hutchison
26. Joan Kunitz
27. Robert D. Lowdon
28. A.D. Lummus

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29. Montana McKean
30. National Association of Homebuilders BUILD Political Action Committee
31. National Federation of Independent Business
32. Bettye Nowlin
33. Gene Overbeck
34. Anne and Paige Pickens
35. Republican Party of Texas
36. Anita Rogers
37. G.W. Sanford
38. John Sauer
39. Arthur Seeligson, III
40. John M. Stemmons
41. Tennaco Employees Good Government Fund
42. Robert L. Trimble
43. Union Pacific Fund for Effective Government
44. John H. White
45. Ross Workman
46. N. M. Yost
47. Proposed letter to the Friends of Phil Gramm and John Baxter, as treasurer
48. Proposed letter to M.N. Bostick
49. Proposed letter to KWTX Broadcasting Company, Inc.
50. Proposed sample letter to individual Respondents listed in recommendation number 12 informing them the Commission found no reason to believe a violation of the Act had occurred
51. Proposed sample letter to the persons other than individuals listed in recommendation number 12 informing them the Commission has found no reason to believe a violation has occurred
52. Proposed sample letter to the other individuals informing them the Commission has decided to take no further action with respect to them in this matter
53. Proposed sample letter to all other respondents informing them that the Commission has decided to take no further action with respect to them
54. General Counsel's factual and legal analysis to the Committee
55. General Counsel's factual and legal analysis to M.N. Bostick
56. General Counsel's factual and legal analysis to KWTX Corporation

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Attachment 1

Mrs. Maragret Alkek

Mr. Alvis Arthur

Mr. James W. Arnold

Dr. William L. Anderson

Mrs. Helen Allen

Mr. C. J. Allen

Mr. Roland Arthur

Mrs. Ebby Halliday Acers

Mrs. Helen Bankston

Mr. Louis A. Beecher I, Jr.

Mr. D. Phil Bolin

Mr. D.E. Brand

Mr. L.D. Brinkman

Mrs. L. D. Brinkman

Mr. B.G. Brookshire

Mr. William E. Burford

Mr. L.D. Burns

Mr. George W. Bush

Mrs. Elloine M. Calder

Mr. Bruce Calder

Mr. Arthur Cary

Mr. Gene F. Canavan

Mr. Donald M. Carlton

Mr. Frank Cass

Mr. William G. Cass

Mrs. Mary Cass

Mr. Michael L. Cass

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Mr. W. Allen Custard

Dr. William H. Crain

Mr. Roy C. Coffee

Mr. Joel Daniel

Mr. Gilbert M. Denman, Jr.

Mr. John W. Dixon

Mr. Richard Doornbos

Ms. Karen Edwards

Mr. Donald S. Elliott

Mrs. Sally Emde

Mr. William O. Emde

Mr. Albert Fay, Jr.

Mr. Jerry W. Freeman

Mrs. Margaret Folsom

Mr. Robert S. Folsom

Mr. K.L. Foree, Sr.

Mr. Wilton H. Fair

Mr. Frank Glover

Mr. Thomas E. Hartin

Mr. Hugh Halff, Jr.

Mr. Willard H. Hammonds

Mr. Paul K. Herder

Mrs. H. Wendell Hobbs

Mr. H. Wendell Hobbs

Mr. Harvey Huie

Mr. James C. Holcomb

Mr. Frank P. Horlock, Jr.

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Mr. Michael D. Hutchison

Mr. Thomas T. Keeler

Mrs. Frances W. Klein

Mrs. Joan Kunitz

Mrs. Ella M. Kellum

Mr. Joe B. Kercheville

Ms. G. Kimberly Klein

Mr. Louis W. Kreditor

Mrs. Jessie V. Kniveton

Mr. James E. Kellum

Mr. William David Lacy

Mrs. Beth Logue

Mr. A. Don Lummus

Mr. R.R. Lowdon

Mrs. Frank W. Mayborn

Mr. Frank Mayborn

Mrs. Carolyn McElyea

Gen. Sam Maddux, Jr.

Mrs. Geraldine Miller

Mr. Vance C. Miller

Mr. L.A. McNeil

Mr. Montana McKean

Mr. A.P. McEvoy

Hon. Eugene M. McElyea

Ms. Catherine W. McAnally

Mr. Walter M. Mischer

Mr. William H. Martin

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Mrs. Karen Martin

Mrs. Bettye Nowin

Mrs. Carl E. Oates

Mr. Carl E. Oates

Mr. Gene E. Overbeck

Mr. C.O. Overcash

Mr. Daniel T. Parker

Ms. Anne Pickens

Ms. Paige Pickens

Mrs. Elga Rea

Mr. Edward Rea

Dr. S.J. Rogers

Mr. T.L. Roach, Jr.

Ms. Laurie Ramsey

Mr. G.E. Roney

Mr. R.J. Schumacher

Mr. Weldon H. Smith

Mr. Richard T. Sink

Mr. John M. Stemmons

Mr. Arthur Seeligson, III

Mr. E. Trine Starnes

Mrs. Merle P. Stieler

Mrs. Pat Schiff

Mr. S.S. Seltzer, Jr.

Mrs. Cathy Sowers

Mr. J.T. Shelton

Mr. Herbert Schiff

Mr. John Sauer

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Mr. Marvin Selig

Mr. Wayne Thomas

Mrs. David Tacke

Mr. Robert L. Triable

Mr. David R. Tacke

Mrs. Theresa Tapp

Mrs. Chester R. Upham, Jr.

Mrs. Esther Westby-Aus

Dr. Robert V. West, Jr.

Mr. John H. White

Mrs. Lellia Windom

Mr. Robert L. Wheelock, Jr.

Dr. Robert E. Windom

Mr. N.M. Yost

Mrs. H.B. Zachry, Jr.

Mr. B.S. Baker

Mr. Thomas M. Benson, Jr.

Mr. M.N. Bostick

Mr. E.B. Bottom

Mrs. Adelle Bottom

Mr. Hogan T. Brooks

Mr. Fred Brown

Mr. Robert J. Bruni

Mr. Sam Buchanan

Mr. Douglas M. Conlee

Mrs. Michelle K. Connor

Mr. Ames Lewis Connor III

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Mr. Harold D. Courson

Mrs. Andrew Fasken

Mr. Ernest Bel Fay

Mr. P. Gill

Mr. George S. Hawn

Mrs. Edith Huebner

Mrs. H.L. Hunt

Mr. Ray L. Hunt

Mrs. Nancy A. Hunt

Mr. J.I. Jackson

Mr. Abe M. Katz

Mr. Frederick R. Meyer

Mrs. Drayton McLane, Jr.

Mr. Robert L. Bradley

Dr. R.A. Fox

Mr. Refugio Gonzales, Jr.

Mr. Walier M. Mischer, Jr.

Mrs. Anita Rogers

Mr. G.W. Sanford

Mr. Frank J. Scanio, Jr.

Mr. Ross Workman

Mrs. Mildred W. Simmons

Mrs. Edith Jones O'Donnell

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The American Bankers Association BankPAC

American Family PAC

Union Pacific Fund

Houston Industries Political Action Committee

Tennaco Employees Good Government Fund

National Homebuilders PAC

Texas Republican Congressional Committee

David Crowley

John Stemmons, jr.

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≠ Indicates Respondent moved without leaving a forwarding address

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1837
Senator Phil Gramm	)	
The Friends of Phil Gramm	)	
and John Baxter, treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 5, 1985, the Commission decided by a vote of 4-0 to take the following actions in MUR 1837:

1. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(8).

2. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(5)(A).

3. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(3)(A).

4. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 102.17.

5. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441a(f) by accepting facially excessive contributions.

6. Find reason to believe that M.N. Bostick violated 2 U.S.C. § 441f.

7. Find reason to believe KMTX Broadcasting Company violated 2 U.S.C. § 441b and 441f.

8. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441a(f) by improperly designating contributions.

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9. Find no reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. §§ 441b and 441f.

10. Reject the offer of the Friends of Phil Gramm and John Baxter, as treasurer, to enter into pre-probable cause conciliation at this time.

11. Refer the Friends of Phil Gramm and John Baxter, as treasurer, for an audit pursuant to 2 U.S.C. § 437g(a)(2).

12. Find no reason to believe the following respondents who properly designated their contributions are in violation of 2 U.S.C. § 441a(a)(1)(A) or 441a(a)(1)(C):

C.J. Allen
American Bankers Association
American Family PAC
Mr. Thomas Benson
Mr. Doug Conlee
Mr. W. Allen Custard
Mr. Gilbert Denman
Mrs. Andrew F. Fasken
Mr. Albert B. Fay, Jr.
Mr. Hugh Halff
Mr. Willard H. Hammonds
Houston Industries Political Action Committee
Mrs. Joan Kunitz
Mr. A.D. Lummus
Mrs. Montana McKean
National Association of Home Builders
National Federation of Independent Business
Mr. Gene Overbeck
Ms. Paige Pickens
Ms. Anne Pickens
Mrs. Anita Rogers
Mr. G.W. Sanford
Mr. Arthur Seeligson
Tennaco Employees Good Government Fund

(Continued)

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Mr. Robert Trimble
Union Pacific Political Action
Committee
Mr. John White
Mr. Ross Workman
Mr. B.S. Baker
Mr. William Martin
Mrs. Edith Jones O'Donnell
Mr. Daniel T. Parker

13. Take no action with regard to the other respondents in this matter.

14. Approve the sample letters attached to the General Counsel's Report signed February 26, 1985.

15. Approve the General Counsel's Factual and Legal Analyses attached to the General Counsel's Report signed February 26, 1985.

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

Attest:

3-5-85
Date

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

Received in Office of Commission Secretary: 2-27-85, 12:22
Circulated on 48 hour tally basis: 3- 1-85, 2:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 7, 1985

James Schoener, Esquire
Miller, Canfield, Paddock & Stone
Suite 1200, 1015 15th Street, N.W.
Washington, D.C. 20005

RE: MUR 1837
The Friends of Phil Gramm
and John Baxter, as treasurer

Dear Mr. Schoener:

The Federal Election Commission notified your clients on November 1, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. Upon further review of the allegations contained in the complaint, and information supplied by both Friends of Phil Gramm ("the Committee") and other respondents, the Commission, on March 5, 1985, determined that there is reason to believe that the Committee and John Baxter, as treasurer, have violated a number of provisions of the Act and the Act's Regulations.

Specifically, the Commission found reason to believe the Committee and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(8) by failing to continuously report outstanding debts and obligations. Additionally, the Commission found reason to believe the Committee and its treasurer violated 2 U.S.C. § 434(b)(5)(A) by failing to properly report expenditures. The Commission also found reason to believe that the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 102.17 by failing to abide by the joint fundraising regulations. Moreover, the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. § 441a(f) by accepting contributions exceeding the Act's limitations and by accepting contributions without proper designations. The Commission also found reason to believe the Committee and Mr. Baxter, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) by failing to correctly and fully identify contributors. Additionally, the Commission found no reason to believe the Committee and its treasurer violated 2 U.S.C. § 441a(f) by knowingly accepting a contribution made in the name of another. The General Counsel's factual and legal analysis, forming a basis for the Commission's finding of these violations, is attached for your information.

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Because of the complexity of the documentaction in this matter, the Commission has also decided to refer this matter to the Audit Division. Auditors from the Commission will be conducting an audit, pursuant to 2 U.S.C. § 437g(a)(2) to ascertain the full nature of the transactions in this matter. Therefore, the Commission voted not to accept your offer to enter into pre-probable cause conciliation at this time.

Under the Act, you have an opportunity to demonstrate that no further action should be taken against your client. You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please file any such response within ten days of your receipt of this notification.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437(a)(12)(A) unless you notify the Commission in writing that your client wishes the matter to be made public. If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

Enclosures
Procedures
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1837

RESPONDENT: The Friends of Phil Gramm and John Baxter, as treasurer

SUMMARY OF ALLEGATIONS

On March5, 1985 the Commission found reason to believe the Friends of Phil Gramm ("the Committee") and John Baxter, as treasurer, violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f) and 434(b)(3)(A) of the Federal Election Campaign Act of 1971, as amended ("the Act"). Additionally, the Commission found reason to believe the Committee and its treasurer violated 11 C.F.R. 102.17. Each of these probable violations are discussed separately below.

FACTUAL BASIS AND LEGAL ANALYSIS

1. Failure to Continuously Report Outstanding Debts and Obligations

The Act requires committees to continuously report outstanding debts and obligations. 2 U.S.C. § 434(b)(8). The Committee is alleged to have failed to report its outstanding debts and obligations. Since the filing of its Statement of Organization in October 1983, until receiving the complaint, the Committee has never reported a single debt. Instead, the Committee's reports have either left blank the provided space for debts or have indicated a zero balance was owed. Additionally,

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Schedules D, itemizing individual debts, have never been filed with any of these individual reports.

The Committee now admits it did indeed have debts and obligations after May 5, 1984, the date of the primary election. Committee's First Response at 1. Amendments to the 1984 July and October Quarterly Reports and Pre-Primary Report have been filed showing this debt. Schedules D, itemizing debts owed and payments made, have also been filed with each of these reports.

In an effort to prove the existence and size of the newly reported primary debt, the Committee has provided the Commission with copies of checks issued to pay primary debts, as well as copies of its outstanding invoices to date. The Committee has added its paid and unpaid expenses for May through October, 1984. This sum has been subtracted from the Committee's cash on hand as of May 6, 1984, with a negative figure (i.e. the primary debt as of October 17, 1984) resulting.

The Office of the General Counsel is not assured by the Committee's debt establishment. Discrepancies are found comparing information contained in the Committee's original Schedules B (itemizing disbursements during reporting periods) and the checks for primary bills provided to the Commission. For example, the 1984 July Quarterly reported a $150,000 disbursement towards the primary to Black, Manafort & Stone on May 7, 1984. No cancelled check has been provided for this transaction. Additionally, the newly filed Schedules B for that period indicates a payment to this vendor of $11,613.06 yet no

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cancelled check has been provided. Additionally, cancelled checks have not been provided for previously reported primary disbursements made to Carpet Services Inc., Century Aircraft Corporation, Arthur Goldbum Investment Associates Inc., and the United States Postmaster. These are all contained in the 1984 July Quarterly Report. Additionally in the 1984 October Quarterly Report first filed with the Commission, the Committee reported disbursements from the primary to Miller, Canfield, Paddock & Stone, and the Texas Employment Commission. Cancelled checks have not been provided evidencing these debts. Presumably, had these debts been included, the newly established primary debt would be less than now reported. Even if the cancelled checks represent the true primary debt, the Committee apparently initially misrepresented its primary debts. Moreover, unless the Committee used separate checks for the same vendor for primary and election debts, the method used by the Committee to establish this debt appears to the unreliable.

Moreover, the Committee has not amended all of its reports to consistently report its outstanding debts and obligations. Only the 1984 April and October Quarterly Reports and the 1984 Pre-General Report have been amended to indicate a primary debt. The Committee still has not reported its outstanding debts and obligations for 1983 Year End, 1984 April Quarterly, and 1984 Pre-primary Reports. Therefore, there is reason to believe the Committee has violated 2 U.S.C. § 434(b)(8).

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2. Failure to Report Expenditures

Upon review of the Committee's checks submitted to prove a primary debt, other reporting violations become apparent. The Act requires that expenditures exceeding $200 be separately itemized and include the identify of the person paid, the date, amount, and purpose of the expenditures. 2 U.S.C. § 434(b)(5)(A). "Indentification" of a person is defined as the listing of that person's name and address. 2 U.S.C. § 431(13)(B). Comparing checks said to be used to pay the primary debt with those which the Committee has previously reported on Schedules B of its reports, it appears the Committee has not properly itemized disbursements.

The following transactions do not appear to have been properly reported; a payment to Southwestern Bell of Dallas Texas on May 7, 1984; payments for telephone service in San Antonio on May 7, 1984; payment to the 1800 Plaza Partnership on May 7, 1984; the date of the payment to Dot McCalpin on 1984 October Quarterly Report, and the address of the Republician Party of Nuces County.

Additionally, discrepancies appear on disbursements made to Delta Airlines on May 3, 1984 and on June 4, 1984. The itemization of vendors on a disbursement to American Express on June 4, 1984 is not apparent on Schedule B of the 1984 October Quarterly Report. The Committee has not itemized on Schedule B disbursements to the "Transfer balance in Telephone Deposit Account to General" on October 11, 1984; the I Love America

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Committee on June 22, 1984, and to Michael Sterlacci on October 17, 1984.

The Committee is required to report and itemize all of its disbursements exceeding $200. In several instances it has either not done so or has provided incorrect information. Therefore, there is reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(5)(A).

3. Joint Fundraising Violations

Responses received from the Committee and from individuals indicates the Committee was engaged in joint fundraising activity. Checks provided by respondents indicate that checks reported as received by the Gramm Committee were in fact made out to the Presidential Nomination Breakfast Ball. Further, the Committee cashed many of these checks and reported all or most of the proceeds of the checks as contributions to the Committee. At least one of the respondents was either unaware or uninformed that the candidate would receive some of the proceeds from the Nomination Breakfast Ball.

The Regulations impose requirements on joint fundraising activity. 11 C.F.R. § 102.17. Participating entities either must establish a separate committee or select one participating political committee to act as a fundraising representative. 11 C.F.R. § 102.17(c)(1). All participants must enter into a written agreement. Id. Every solicitation must include a notice stating the names of participating committees and the formula for allocating proceeds. 11 C.F.R. § 102.17(c)(2). A separate depository account must be established and each political

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committee must amend its Statement of Organization to name this account. 11 C.F.R. § 102.17(c)(3). All joint fundraising proceeds must be deposited into this account. 11 C.F.R. § 102.17(c)(3)(ii).

The Gramm Committee has apparently not met these requirements. First, it does not appear to have met the notice requirements. It has not amended its Statement of Organization to include the name of a depository account established for the fundraising. Moreover, the Gramm Committee appears to have deposited these checks into the Committee's account instead of depositing them in a separate joint fundraising account as required. A review of reports does not appear to indicate how or when the Committee distributed these proceeds. Therefore, there is reason to believe that the Committee is in violation of 11 C.F.R. § 102.17.

4. Facially Excessive Contributions

The Committee's reports indicate it has received excessive contributions. The Act establishes a $1,000 contribution limitation per person per election. 2 U.S.C. § 441a(1)(A). Unauthorized political committees are limited to $5,000 per election. 2 U.S.C. § 441a(a)(2)(C). An election is defined to include general, special, primary or runoff elections. 2 U.S.C. § 431(1)(A). Committees are prohibited from knowingly accepting contributions exceeding the Act's limitations. 2 U.S.C. § 441a(f).

The Committee has reported the excessive contributions from the following individuals; Gene Canavan (two $1,000 contributions

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to the general election); Robert Lowdon (two $1,000 contributions to the general election); and Mrs. H.B. Zachry (two $1000 contributions to the general election). Therefore, there is reason to believe the Committee may have violated 2 U.S.C. § 441a(f).

5. Failure to Correctly Report Contribution Information

The Act requires itemization of all contributions exceeding $200. 2 U.S.C. § 434(b)(3)(A). Such limitation must include the identify of the contributor and the date and amount of the contribution. Id. The Act defines identification of an individual as listing the name, address, occupation, and employer of that individual. 2 U.S.C. § 431(13).

The Committee has incorrectly identified the following contributors; Mrs. B.S. Baker (Mr. Baker's name and occupation is listed with the primary contributions in Exhibit B to the Committee's Second Response); American Airlines Political Action Committee (apparently attributed to Mr. Gene Overbeck); contributions and amounts made by Daniel R. Parker, Daniel T. Parker, and William R. Parker; and Mrs. W. G. Sanford (her spouse is incorrectly attributed making two $1000 contributions). Additional misidentifications have been made regarding contributions by Mr. Arthur Seelingson III (identified as making a primary and a general contribution when only a general election contribution was made); and Transco Energy PAC (apparently incorrectly attributed to Mr. Ross Workman).

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Moreover, the Committee has apparently misreported the dates of the following contributions; Mr. William Burford (check sent on June 30, 1984, Committee reported on August 23, 1984); Mr. Thomas Hartin (check given personally on August 22, 1984; Committee reported on September 24, 1984); Mr. Don Lummus (contribution sent on July 23, 1984, Committee reported on September 24, 1984); and the National Association of Homebuilders (check sent May 21, 1984, Committee reported on July 31, 1984).

The Committee incorrectly reported the amounts of other contributions. Contributions by Mrs. Andrew Faskin (incorrect yearly aggregate), R.L. Faree (inconsistent reporting of contributions), and Mrs. Anita Rogers (has never made any contribution), have been improperly reported. Finally, although now amended, the Committee incorrectly reported contributions from the National Association of Builders, the National Federation of Independent Business, the Tennaco Employees Good Government Fund, Mr. David Crowley and Mr. Michael Hutchison.

Further, despite these amendments, the Committee continues to inconsistently report information regarding the following contributors; Mr. Arthur Cary, Mr. William Martin, and Mr. Doug Conlee.

The Committee has failed to correctly report the identities of contributors and the dates and amounts of their contributions. Accordingly, there is reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(3)(A).

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6. Excessive Contributions and Improperly Reported Contributions Resulting from Improper Designations

The Committee has not met the Regulations requirements for accepting either spousal contributions or primary contributions after the date of the primary. A contribution signed by one spouse and containing no designation that the contribution is intended to be from two individuals, is excessive to the extent it exceeds the permissible limitations for a single individual as set by the Act. See 11 C.F.R. § 100.7(c). Additionally, a contribution after the date of the primary which does not designate that a primary contribution is intended, is therefore a contribution to the general election. See 11 C.F.R. § 110.1(a)(2). Thus, an excessive contribution results when a contribution is made by an individual already contributing the maximum to the general election after the date of the primary without proper designation.

The Committee has reported two $1000 contributions, one to the primary and the other to the general election where two individuals each apparently gave an undesignated contribution after the date of the primary. This occurred in contributions attributed to William A. Custard and Montana McKean.

The Committee has also reported contributions attempted to be given by husband and wife as contributions to the primary and general election from the husband. Contributions attributed to Mr. Thomas Benson, Mr. William Burford, Mr. Hugh Halff, Mr. Willard Hammonds, Mr. G.W. Sanford, Mr. Louis Beecherl, Mr. Robert Lowdon, Mr. Robert Bradley, Mr. Robert Trimble, Mr. Ernest Fay, Jr. and Mr. Clifton Overcash, were all intended

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to be joint contributions. If the Committee believed these contributions to be from a single individual, they should have recognized an excessive contribution since it appears that these checks did not contain designations for the general or primary elections. Moreover, the Committee did accept such a $2000 check without designations from Mrs. Karen Martin.

Finally, the Committee's reports indicate many instances where a $1,000, undesignated contribution made after the date of the primary has been reported as a $1000 contribution to both the general and primary elections. This list includes the contributions of Mr. Gilbert Denman, Mr. and Mrs. Folsom, Mrs. Joan Kunitz, Mr. A.D. Lummus, Mr. William Martin (who made an earlier $1000 contribution in December, 1983), Ms. Paige Pickens, Ms. Anne Pickens, and Mr. John White.

The Committee accepted improperly designated contributions. As shown above, these contributions made after the date of the primary without proper designations are attributed to the general. General election contributions are limited to $1000. Therefore, by accepting undesignated contributions exceeding this amount, there is reason to believe the Committee and its treasurer violated 2 U.S.C. § 441a(f). Additionally, a check for $2000 drawn on a joint account without either an election designation or an indication that a joint contribution was intended is also attributable towards the signer's general election limitation. Thus, by accepting amounts exceeding $1000 there is reason to believe the Committee and its treasurer violated 2 U.S.C. § 441a(f).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 7, 1985

Mr. M.N. Bostick
P.O. Box 7528
Waco, Texas 76714

RE: MUR 1837
Mr. M.N. Bostick

Dear Sir:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complainant was forwarded to you at that time.

On March 5, 1985, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials 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 you, 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 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.

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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 Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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

8204074309

GENERAL COUNSEL LEGAL AND FACTUAL ANALYSIS

MUR: 1837

RESPONDENT: M.N. Bostick

SUMMARY OF ALLEGATIONS

On March 5, 1985 the Commission found reason to believe Mr. M.N. Bostick violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect the contribution of another.

FACTUAL BASIS AND LEGAL ANALYSIS

The Office of the General Counsel received a complaint on November 1, 1984 from Ms. Donna Mobley of Austin Texas. It alleged in relevant part that the Friends of Phil Gramm ("the Committee") accepted excessive campaign contributions. Mr. M.N. Bostick was notified as a respondent in this matter.

Corresponding with this Office, Mr. Bostick denied making an excessive contribution. He admitted the contribution attributed to him was actually from the KWTX Broadcasting Company of Waco, Texas. This corporation is said to have fully reimbursed Mr. Bostick for the contribution. It is admitted that Mr. Bostick is the president and general manager of KWTX Broadcasting Company, Inc.

The Act prohibits a corporation from contributing to a federal election from its general funds. 2 U.S.C. § 441b. Additionally, the Act prohibits a person from making a contribution in the name of another and also prohibits a person from knowingly permitting his name to be used to effect such a

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contribution. 2 U.S.C. § 441f. The KWTX was the source of the Contribution. Mr. Bostick permitted his name to be used to conceal this fact. Therefore, there is reason to believe Mr. Bostick violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

KWTX Broadcasting Company, Inc.
P.O. Box 7528
Waco, Texas 76714

March 7, 1985

RE: 1837
KWTX Broadcasting Company Inc.

Sir/Madam:

On March 5, 1985, the Federal Election Commission determined that there is reason to believe that KWTX Broadcasting Company, Inc. violated 2 U.S.C. §§ 441b and 441f, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 the corporation. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials 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 the corporation, 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 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

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of the Act. If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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

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GENERAL COUNSEL LEGAL AND FACTUAL ANALYSIS

MUR #: 1837

RESPONDENT: KWTX Broadcasting Company, Inc.

SUMMARY OF ALLEGATIONS

On March 5, 1985 the Commission found reason to believe the KWTX Broadcasting Company of Waco, Texas violated 2 U.S.C. § 441f and 441b by knowingly making a contribution from corporate funds in the name of another.

FACTUAL BASIS AND LEGAL ANALYSIS

The Office of the General Counsel received a complaint on November 1, 1984 from Ms. Donna Mobley of Austin, Texas. It alleged in relevant part that the Friends of Phil Gramm ("the Committee") accepted excessive campaign contributions. Mr. M.N. Bostick was notified as a respondent in this matter.

Corresponding with this Office, Mr. Bostick denied making an excessive contribution. He admitted the contribution attributed to him was actually from the KWTX Broadcasting Company of Waco, Texas. This corporation is said to have fully reimbursed Mr. Bostick for the contribution. It is admitted that Mr. Bostick is the president and general manager of KWTX Broadcasting Company, Inc.

The Act prohibits a corporation from contributing to a federal election from its general funds. 2 U.S.C. § 441b. Additionally, the Act prohibits a person from making a contribution in the name of another 2 U.S.C. § 441f. The KMTX Broadcasting Company was the source of the contribution, however, this contribution was made in the name of Mr. Bostick. Therefore, there is reason to believe the KWTX Broadcasting Company violated 2 U.S.C. §§ 441b and 441f.

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GCC# 6988
Reply

LAW OFFICES OF
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WASHINGTON, D.C. 20005

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SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
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GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

March 27, 1985

5 MAR 27 P1:24

HAND DELIVERED

Kenneth A. Gross, Esquire
Deputy General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: Friends of Phil Gramm and John Baxter as treasurer
M.U.R. 1837

Dear Mr. Gross:

I am hand delivering today an original and three (3) copies of the Response to the General Counsel's Factual and Legal Analysis on behalf of Friends of Phil Gramm and John Baxter as treasurer. I have also sent the required ten (10) additional copies to the Secretary's office.

As I pointed out in our Response, we have requested a conference with the General Counsel's office to go over the matters at issue. We still believe that such a conference would at least reduce the problems between the Commission and my clients.

If you can give me several days' notice, I will arrange to have the accountant come up from Texas and meet with your people.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener

JFS/cb
Enclosures

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Before the
FEDERAL ELECTION COMMISSION

Respondent: FRIENDS OF PHIL GRAMM and
JOHN BAXTER as Treasurer, MUR No. 1837

RESPONSE TO GENERAL COUNSEL'S
FACTUAL AND LEGAL ANALYSIS

NOW COMES Friends of Phil Gramm, and John Baxter, its Treasurer, and files this Response to the General Counsel's Factual and Legal Analysis.

GENERAL COMMENTS

In addition to the material heretofore filed in reply to the Complaint in this cause, the Friends of Phil Gramm ("Committee") and John Baxter desire that the Federal Election Commission ("Commission") be advised that the Committee and the treasurer made diligent efforts to keep reporting of debts and obligations, as well as contributions received in a correct manner.

At first the Committee hired a firm named CLESA of Washington, D.C. to do its accounting. This firm had experience in computer bookkeeping capability, but its familiarity with F.E.C. requirements was limited. The volume of contributions and specialized bookkeeping proved too great for them. The Committee then proceeded to use CAMPAC, another computerized bookkeeping service specializing in FEC reporting. When added to CAMPAC's other accounts, the volume of the response to the Gramm campaign added to the unprocessed receipts left over from the previous service, proved to be beyond their capacity as well. At the same

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time, numerous problems created by the volume of the receipts arriving at the designated depository and lack of trained personnel to open, bank and account for the contributions caused a considerable delay. Attempts by that bank to use temporary personnel also caused errors and delay.

At that time -- in mid-campaign -- the Committee decided to take the full operation "in house", purchasing a computer, designing the program and hiring what they believed were capable and qualified operators. Several of these operators were unable to learn the system. Unfortunately, this new and unique problem also resulted in further errors and change of personnel. The demands of running a complicated, large state campaign with multiple headquarters and numerous local campaign managers, as well as well-meaning but error producing volunteers, also contributed to delays in obtaining receipts and delays in obtaining correct invoices.

Since the time of filing this Complaint, the Committee has incurred over $100,000 in legal and accounting expenses to respond to the matters raised in the Complaint and to correct other errors that have been discovered. Further costs involved in conducting a full audit as suggested by the Commission would require additional costs to the Committee, as well as the Commission, that the Committee believes to be unnecessary, and unduly burdensome.

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SPECIFIC RESPONSE

1. In Response to Allegation of Failure to Continuously Report Outstanding Debts and Obligations

Respondents have admitted error in the two reports complained of in the Complaint and offered to conciliate the matter. The Committee was delayed in obtaining the correct information on obligations and did not wish to indicate debts and obligations it could not support with accurate figures.

The Office of the General Counsel now states that it is "not assured by the Committee's debt establishment" (at page 2). At the time of filing the Response to the Complaint with the General Counsel, the Committee had available its Certified Public Accountant from Texas and asked for a conference to explain the filings. This offer was refused with the advice that we would be allowed such conference before the matter was sent to the Commission. No such conference was ever held although the Committee and its accountant were continuously available. Cancelled checks for most of the disbursements referred to by General Counsel could have been furnished if requested, but no such request was made. The example cited by General Counsel involving the $150,000 disbursement to Black, Manafort and Stone on May 7, 1984 was a wire transfer, so no cancelled check was involved, although documentation is available. Wire transfers of funds have been previously approved by the Commission (AO 1982-25).

On page 3, the General Counsel asserts that "the Committee apparently initially misrepresented its primary debts." The Committee is totally at a loss to determine where the Commission

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arrives at that observation. Again, perhaps a conference would have clarified the confusion that appears to exist.

The Counsel's report on page 3 points out that certain other reports have not been amended. The Response to the Complaint heretofore filed covered the areas involved in the Complaint; no allegations were made that 1983 year-end reports, or 1984 April quarterly and primary reports, needed amending. The Committee, however, has requested its accountants to make a complete and total audit of all transactions and, if needed, amendments will be filed.

2. In Response to Allegations of Failure to Report Expenditures.

The matters raised in item 2 are the usual and normal requests for additional information that are routinely handled by the FEC Reports Analysis Division. The Committee cannot understand the attempt of the General Counsel to raise these items to a violation level. Again, a conference as requested by the Committee would have clarified these concerns.

3. In Response to Joint Fundraising Violations.

As the Committee indicated in its original Response, the joint fundraising activity was still to be responded to. The joint fundraiser was only collaterally involved in the matters before the Commission raised by the Complaint in MUR 1837. By way of Response, the Committee admitted that it was revising the accounting of the funds raised by a joint fundraising activity and it is presently completing that task. Completion of that accounting was, and still is, a part of the proposed conciliation.

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4. In Response to Facially Excessive Contributions.

The correction of the reports for excessive contributions has been filed in each of the cases listed. Further facially excessive contributions, if any, which may be disclosed by the complete audit being conducted by our accountant will be promptly refunded.

5. In Response to Failure to Correctly Report Contribution Information.

Reports made by individual respondents in most of the items involved in this category (viz. Mrs. B. S. Baker, Daniel R. Parker, Daniel T. Parker, William Parker, Mrs. G. W. Sanford, Arthur Seelingson III [the correct spelling of this contributor's name is "Seeligson"]), are believed to have been corrected by their Response. The discrepancy between check dates and reporting dates often arose because checks were not delivered to the Committee on the date of the check, or were sent by mail from Washington, D.C. to Texas and were delayed while contributions were "batched." As noted most if not all of the incorrectly reported contributions have been corrected and our offer to confer would have undoubtedly have corrected any additional oversights.

6. In Response to Allegation of of Excessive Contributions and Improperly Reported Contributions From Improper Designations.

The allegations of the General Counsel to this category arise outside of the matters raised in the original Complaint. This further accentuates the reason for the requested conference. These matters were not required to be answered by the Complaint, but the Committee asserts that it either has or did obtain some

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form of spousal designation for double marital contributions. The General Counsel's office did not request that the Committee furnish evidence or back up. Considerable effort was expended throughout the campaign to obtain correct spousal designations.

Conclusion

Respondents submit that the General Counsel's Report has inflated a complaint involving an omission to file debt reports into an attempt to make a number of small routine corrections, (usually and normally handled by the FEC Reports Analysis Department) into a major violation. Respondents have at all times been ready and willing to make the corrections and revisions necessary to comply with the law and regulations, but believe the same is not a matter requiring enforcement proceedings.

The Committee submits that the offer of conciliation certainly was made in good faith and in conformance with the legislative intent of the F.E.C.A. and should not be so lightly dismissed. The Committee continues to offer conciliation and requests a conference with the General Counsel with our accountant to reduce the areas of conflict and misunderstanding prior to undertaking the expensive and time-consuming audit.

Dated: March 27, 1985

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener

James F. Schoener
Counsel to Friends of Phil Gramm
and John Baxter, Treasurer
Suite 1200
1015 15th Street, N.W.
Washington, D.C. 20005
202/789-8640

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GCC# 7176

THE FEC

KWTX BROADCASTING COMPANY, INC.
4520 BOSQUE BLVD. P.O. BOX 7628 WACO, TEXAS 76710 PHONE 776-1330 AREA CODE 817

85 APR 15

KWTX-AM-FM-TV
WACO, TEXAS

KXII TV
ARDMORE, OKLAHOMA
SHERMAN, DENISON, TEXAS

KLFY TV
LAFAYETTE, LOUISIANA

KBTX TV
BRYAN, TEXAS

KNAL RADIO
VICTORIA, TEXAS

April 11, 1985

Federal Election Commission
Washington, D. C. 20463
ATTN: Patty Rielly

Re: MUR 1837
M. N. Bostick

Dear Ms. Rielly:

In connection with the above referenced matter, my wife and I attended a dinner which was given in connection with the Phil Gramm campaign. A table for ten people cost $1,250.00, $125.00 per seat. We paid $1,250.00 for ten dinners.

Under Texas law, all property is community property. My wife and I both attended this dinner, and money spent for the ten dinners was community property. I raise the question as to whether this violates the Federal Election Code. If it does in fact, I would request that we enter into pre-probable cause negotiation.

Sincerely yours,

M. N. Bostick

M. N. Bostick

MNB/dm

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GCC# 7180
THE FEC

KWTX BROADCASTING COMPANY, INC.
4520 BOSQUE BLVD. P.O. BOX 7628 WACO, TEXAS 76710 PHONE 776-1330 AREA CODE 817

85 APR 15 P 1:09

KWTX-AM-FM-TV
WACO, TEXAS

KXII TV
ARDMORE, OKLAHOMA
SHERMAN, DENISON, TEXAS

KLFY TV
LAFAYETTE, LOUISIANA

KBTX TV
BRYAN, TEXAS

KNAL RADIO
VICTORIA, TEXAS

April 11, 1985

Federal Election Commission
Washington, D. C. 20463

RE: MUR 1837
KWTX Broadcasting Company

Dear Sir/Madam:

In connection with your letter of March 7, 1985 addressed to KWTX Broadcasting Company, Inc., this is to advise that the amount that was spent for a dinner in connection with the Phil Gramm campaign in the amount of $1,250.00, was reimbursed to M. N. Bostick by KWTX Broadcasting Company inadvertently. It was not known at the time that the company could not make this contribution, and a refund was made to Mr. Bostick anticipating Board approval of this refund at a subsequent date. Upon learning that such a contribution would violate a section of the Federal Election Code, the matter was not presented to the Corporate Board for approval. The amount advanced to Mr. Bostick was fully reimbursed to the company, and was not in fact a company contribution.

If any further information is needed relating to this matter, please advise.

Sincerely yours,

KWTX BROADCASTING COMPANY

M. N. Bostick

M. N. Bostick
President

MNB/dm

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MUR # 1837

THE FEC

KWTX BROADCASTING COMPANY, INC.
4520 BOSQUE BLVD. P.O. BOX 7528 WACO, TEXAS 76710 PHONE 776-1330 AREA CODE 817

85 MAY 2 P1:22

KWTX AM-FM-TV
WACO, TEXAS

KXII TV
ARDMORE, OKLAHOMA
SHERMAN, DENISON, TEXAS

KLFY TV
LAFAYETTE, LOUISIANA

KBTX TV
BRYAN, TEXAS

KNAL RADIO
VICTORIA, TEXAS

April 25, 1985

MAY 2 P3:00

Federal Election Commission
Washington, D. C. 20463

RE: MUR 1837
KWTX Broadcasting Company

Dear Sir/Madam:

Re the above referenced matter, if there is a violation in connection with this matter, it is one of complete inadvertence and done without advance knowledge of any possible violation. If the matter cannot be completely excused, this is a request for pre-probable cause negotiation.

Sincerely yours,

KWTX BROADCASTING COMPANY

M. N. Bostick
President

MNB/dm

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LAW OFFICES OF
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SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN –
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

May 6, 1985

Charles N. Steele, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1837: Donna Mobley vs. Friends of Phil Gramm, et al.

Dear Mr. Steele:

Please find enclosed herein for filing in the above-captioned cause the original and three (3) copies of Respondents' Motion for Reconsideration of Commission's Action of March 5, 1985, with attached Memorandum of Law On Motion To Reconsider.

If there are any questions regarding the enclosed documents, please contact me at your earliest convenience.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener
Counsel For Respondents (cb)

JFS/cb
Enclosures

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Before the
FEDERAL ELECTION COMMISSION

DONNA MOBLEY,

Complainant,

vs. M.U.R. No. 1837

FRIENDS OF PHIL GRAMM,
PHIL GRAMM, RUTH CYMBER
and JOHN BAXTER,

Respondents.
_____/

MOTION FOR RECONSIDERATION
OF COMMISSION'S ACTION OF MARCH 5, 1985

Friends of Phil Gramm, the principal campaign committee of Senator Phil Gramm, and John Baxter, its treasurer, hereby move the Commission to reconsider their action of March 5, 1985 as is evidenced by the attached letter of the Commission dated March 7, 1985 (Exhibit 1).

The grounds for this motion are as follows:

1. The matters found under the "reason to believe" category in said action arise from matters outside the complaint filed in this cause. See Complaint by Donna Mobley in MUR 1837.

2. Respondents were not given an opportunity prior to such "reason to believe" finding to present their response to demonstrate that no action should be taken against them concerning matters which were not a part of the original complaint. See Federal Election Commission v National Rifle Association of America, D.C.D.C. 1983, 553 F. Supp. 1331.

3. The office of General Counsel has made errors in its reports to the Commission that were the apparent basis of the Commission action to audit respondents, and requests to confer with the General Counsel's Office to correct such errors have been ignored or neglected. See Response to General Counsel heretofore filed.

4. The ordering of an audit is not justified on the basis of the record and is burdensome and unnecessary in light of respondents' offer to conciliate.

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5. Arbitrary rejection of pre-probable cause conciliation by the General Counsel's Office is discriminatory and contrary to the Congressional intent that compliance be obtained by conference, conciliation and persuasion.

6. 2 U.S.C §438(b) and regulation 11 C.F.R. 104.16(b) provide that an audit of a principal campaign committee shall be commenced within 30 days of the vote of the Commission, and no audit has been commenced within such time limit.

7. 2 U.S.C. §438(b) and regulation 11 C.F.R. 104.16(b) provide that an audit of an authorized committee of a candidate shall be commenced within six months of the election for which it was authorized. As of this date the time to commence an audit of the general election has expired.

8. In a good faith effort to comply with all reporting requirements the respondents have engaged competent certified public accountants to review and correct any accounting errors from the campaign; that the respondents have incurred considerable expense to engage these efforts and the extra expenses and costs involved with a full unjustified audit would amount to denial of First Amendment and Due Process rights of respondents. See Freedman v Maryland, 380 U.S. 51, at 59, 61 85 S. Ct. 734 (1965) and Federal Election Commission, First Amendment and Due Process, 89 Yale Law Journal 1199 @ 1216 (1980).

Counsel further requests that this Commission provide complete and detailed reasons for proceeding further beyond the scope of the complaint and an opportunity to demonstrate that no further action should be taken. This motion is accompanied by a Memorandum of Law on the matters involved.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener

James F. Schoener
Counsel to Respondents
1015 15th Street, N.W., Suite 1200
Washington, D.C. 20005
202/789-8640

Dated: May 6, 1985

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Before the
FEDERAL ELECTION COMMISSION

DONNA MOBLEY,

Complainant,

vs. M.U.R. No. 1837

FRIENDS OF PHIL GRAMM,
PHIL GRAMM, RUTH CYMBER
and JOHN BAXTER,

Respondents.
_____/

MEMORANDUM OF LAW
ON MOTION TO RECONSIDER

Facts

A complaint filed in this cause on October 30, 1984 by Donna Mobley alleged that respondents failed to file a schedule of outstanding primary election debts remaining after the Republican primary election for the office of United States Senator from the State of Texas. Respondent has filed a long and thorough response including amendments to show that there was, in fact, a debt remaining (and indeed still remains) from the May 5, 1984 primary.

The report of the Office of the General Counsel (hereinafter "OGC") submitted to this Commission has raised many other and additional collateral matters which apparently led this Commission on March 5, 1985 to order an audit of respondent committee.

Respondents have moved this Commission to reconsider this action.

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Law

1. The complaint filed in this cause sets the parameters of the actions this Commission should take under this Matter Under Review 1837. Since the 1979 amendments to the Federal Election Campaign Act (hereinafter "FECA"), the Commission has been charged with the obligation of providing respondents an opportunity to demonstrate that no action should be taken against them. See 2 U.S.C. §437g(a)(1) and remarks of Rep. Thompson, Cong. Record, Sept. 10, 1979, p. 23813. The matters raised by the general counsel are unrelated to the original complaint and ought to be initiated as a separate matter or should be revised in such a way as to allow respondent the rights clearly set forth in the amended enforcement provisions.

In the case of Federal Election Commission v National Rifle Association, 553 F.Supp. 1331 (1983) the Court observed:

> ...[W]hile our circuit has noted in a similar context that FEC determinations which construe FECA 'are entitled to great respect by the courts because of the extremely delicate nature of the tremendous power entrusted to it', this broad grant of discretion also assumes that the FEC will be 'sensitive to the great trust imposed on it to not overstep its authority by interfering unduly in the conduct of elections'. The statute has its own penalties, procedures, remedies and time schedules and these should be observed. @1333. (Emphasis supplied)

In 1979 when Congress passed the amendments to the FECA, it made major changes in the complaint procedure. Congress specifically stated in its explanation of this section that it was designed to "increase opportunity for the respondent to present his or her defense." Public Laws 96-187, 96 Cong. 1st

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Sess. Vol. 3, p. 2860. If the assertion of the OGC is correct, that the mere filing of a complaint opens a respondent to investigation of the complete campaign, then the "increase in opportunity" to respondent provided by Congress has been administratively cancelled. Indeed, often the Commission has adopted a different procedure in other MURs; that when investigation of one matter discloses a possible collateral violation, a new matter under review (MUR) is opened. Apparently in this case the Commission has chosen a course that will deny Respondents their chance to present their defense to those collateral matters and fails to give Respondents a notice of the nature of the charges involved. While respondents recognize that there are additional proceedings where these matters might be raised, and that there are differences from the NRA case, nonetheless, these collateral matters ought to be considered by this Commission in light of the obligation to provide an "opportunity to demonstrate that no action should be taken." Therefore, Respondents contest the actions of the Commission as not being based on the statutorily prescribed notice of charges:

> Congress expressly provided that statutorily prescribed notice of charges...[with] 'factual' and 'legal' basis of allegations be furnished respondent...

Federal Election Commission v National Rifle Association, 553 F. Supp. 1331 @ 1337 (1983).

The precise issue of whether the Commission could proceed to suit where it had not afforded the respondent its opportunity to comment on specific alleged violations was addressed in the National Rifle Association case (supra). Judge Hogan of the

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United States District Court of the District of Columbia rejected the FEC's assertion that the omission to give respondent this opportunity was "harmless". The Court held that a total failure of the FEC to comply with the statutory prerequisite of affording the opportunity to respond was fatal as to that part that was not in the original notice, and that the complaint had to be dismissed for want of subject matter jurisdiction (at 1338). Similarly, it is submitted in this case that the Commission has probably jeopardized its jurisdiction to proceed further because of its failure to precisely follow the statutory procedures.

Such legal and factual basis is necessary to give respondent a fair opportunity to demonstrate no action should be taken, Id. See also: 2 U.S.C. §437g(a)(3). In this case, no such legal or factual charge that goes beyond the matters alleged in the Mobley complaint can be ascertained, and on the record that exists Respondents have been unable to formulate a factual and legal response to such new matters.

In the House Report to the 1979 amendments to FECA, which simplified and reorganized the enforcement procedures of the Act, the Committee explained:

> The purpose of this [initial] notice is to inform the respondent that a complaint has been filed [and] of the basic charges against him or her....

H.Rep. No. 96-422, 96th Cong., 1st Sess. at 20 (1979), U.S. Code Cong. & Admin. News 1979, pp. 2860, 2880. Senator Hatfield later explained on the floor:

> A number of other provisions deserve comment. There are substantial modifications of the enforcement process. A respondent is given additional protections by requiring that he or she be given a more detailed notice of any

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> charges, as well as an opportunity to formally respond to charges prior to any determination by the Commission that he or she violated the Act.

125 Cong. Rec. S.19099 (Dec. 18, 1979).

Therefore, the Commission ought to reconsider the action of March 5, 1985 in this matter.

2. The Federal Election Commission has arbitrarily and without proper consideration rejected respondents offer to conciliate. At Respondents' first opportunity they offered to conciliate the issues raised by the Mobley complaint. Respondents also offered to produce their Certified Public Accountant to answer any and all questions that might be raised by the OGC. Although the OGC recognized our offer to confer, they have steadily refused to meet with Respondents. As Respondents noted in their Response to General Counsel's Factual and Legal Analysis:

> The Office of the General Counsel now states that it is 'not assured by the Committee's debt establishment' (at page 2). At the time of filing the Response to the Complaint with the General Counsel, the Committee had available its Certified Public Accountant from Texas and asked for a conference to explain the filings. This offer was refused with the advice that we would be allowed such conference before the matter was sent to the Commission. No such conference was ever held although the Committee and its accountant were continuously available. Cancelled checks for most of the disbursements referred to by General Counsel could have been furnished if requested, but no such request was made. The example cited by General Counsel involving the $150,000 disbursement to Black, Manafort and Stone on May 7, 1984 was a wire transfer, so no cancelled check was involved, although documentation is available. Wire transfers of funds have been previously approved by the Commission (AO 1982-25).

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This is only one of the examples of the errors of OGC upon which the Commission acted; other examples can be furnished.

3. The Commission has ignored the Congressional mandate of the preferred method of correction of errors by conciliation conference and persuasion. Since the enactment of the FECA that set up this Commission in 1974, the preferred method of settlement and adjustment of alleged violations has been by conciliation. Respondents promptly responded to the original complaint in this cause, offered to confer and conciliate and filed extensive and elaborate amendments. Contrary to the intent and spirit of the FECA, the OGC neglected and refused conciliation in this cause. This is contrary to the conciliation and settlement made with regard to the Mondale campaign and is even more egregious since the Mondale campaign dealt with taxpayer financed election campaigns where the statute requires a greater degree of surveillance. The OGC not only ignored the request for pre-probable cause conciliation, but ignored several requests for conference to explain technical and involved accounting matters.

For these reasons this Commission ought to vacate its actions of March 5, 1985 and remand this matter to the OGC for compliance with the statutes.

4. Certain mandatory statutes have been ignored in the proposed action by this Commission seeking audit of respondent committee. The complaint of Mobley sought disclosure of the primary election debts: the primary election involved in this cause occurred in

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May 1984. The FECA defines "election" as any general, special, primary or run-off election, 2 U.S.C. §431(1)(A). The intent of Congress is clear that:

> Such audit shall be commenced within 30 days of such vote, except that any audit of an authorized committee of a candidate, under the provisions of this subsection, shall be commenced within 6 months of the election for which such committee was authorized.

2 U.S.C. § 438(b).

Congress has placed a limit on audits of candidate committees which have long since passed as to the respondent's primary election. As to the general election there has been a failure to commence any audit within 30 days of the vote of this Commission, and on the date of this memorandum there has been no audit commenced so the audit of the general election has also been barred by time.

Anticipating that the OGC will argue that audits undertaken under enforcement provisions (§437g) are outside the time constraints of §438(b). Counsel for respondents submit that the legislative history of the 1979 amendments do not justify such assertion.

First, the legislative history is quite to the contrary. See: Legislative History of the Federal Election Campaign Act Amendments of 1979, U.S. Government Printing Office (1983), (hereafter referred to as "Leg. History"). The "discussion drafts" in both the House and Senate which limited audits originally carried a provision that provided:

> Nothing in this section shall prohibit the Commission from conducting audits when it has received a complaint or where it has other information leading it to believe that such audit is required.

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Leg. History, p. 83, 128, See, House Report on H.R. 5010 - 96-422 (Sept. 7, 1979).

As the legislation ultimately passed in both the Senate and House there was no provision excepting complaints or Commission-generated actions from time restrictions on commencement of audits. These significant omissions from the legislation that passed clearly demonstrate a Congressional intent that the 30 day and 6 month provisions apply inclusively.

As Senator Hatfield (Ranking Member of the Senate Rules Committee) said on the debate on the 1979 amendments:

> The bill sets out more clearly the guidelines the Commission is to follow in conducting audits of political committees.

Cong. Record S.36745 (Dec. 18, 1979); Leg. History p. 549.

But even more enlightening were the remarks of the House Administration Committee chairman, Representative Thompson of New Jersey, when he explained to the House the effect of the Senate amendments that included the provision of §438(b)):

> We have abolished random audits and substituted clear procedures for the Commission to follow before instituting any audit. The Commission will be only able to audit a candidate's committee when its reports fail to satisfy specific threshold requirements for substantial compliance, and then only after the Commission has voted by an affirmative vote of four members to proceed. Additionally, any audit must begin within 30 days of a vote to audit and the audit of a candidate's committee must begin within 6 months following the election. (Emphasis supplied).

Cong. Rec. H.37197 (Dec. 20, 1979); Leg. History at p. 563.

Mr. Frenzel, ranking minority member responded to Chairman Thompson's analysis by concurring in the description of these

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provisions. Ibid, Cong. Rec. Even President Carter on signing the Amendments remarked that these improved the FECA by eliminating burdensome regulation of candidates and committees.

A review of the early testimony to the legislative committees indicate a desire by the Commission and others to preserve the Commission's right to audit without restraint. As the bill progressed in Congress a provision for only one audit of a candidate's committee per election cycle was inserted in the bill, but ultimately the even more restrictive provisions of Section 438(b) in the present law were adopted. The Commission obviously realized its audit power was in jeopardy when then Commission Chairman Robert O. Tiernan and Vice Chairman Max Friedersdorf testified before the Senate Committee on Rules and Administration concerning this legislation in July of 1979. Other witnesses, friendly to the Commission's actions on random audits, criticized the Congressional "attack" on audit authority which had occurred in Congress in the previous authorization bill. See, Leg. History p. 47.

It is obvious that Congress intentionally and deliberately placed time and procedural restrictions on the Commission's audit authority. Those restrictions have been ignored in the action taken against the Friends of Phil Gramm and its treasurer, John Baxter. This Commission ought to reconsider and cancel such improper actions.

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5. The Commission's actions, unless changed by the requested reconsideration, will lead to a protracted costly defense which would amount to a denial of due process. In the 1980 Yale Law Journal article, The Federal Election Commission, the First Amendment, and Due Process, 89 Yale Law Journal 1199, the author discusses the issue of denial of due process by protracted legal defense. Expressing certain well-known principles of due process, the author states:

> The second principle of First Amendment due process is that a procedure must not unnecessarily impose heavy costs upon the defense of First Amendment rights. The prospect of a protracted, costly defense might induce self-censorship and thus chill protected speech.

In First National Bank of Boston v Bellotti, 435 U.S. 765 at 785 n. 21 (1978), the Supreme Court recognized that:

> ...the burden and expense of litigating the issue...would unduly impinge on the exercise of constitutional right.

The actions of the Commission here seem to directly reflect the concern of the Yale Law Journal article:

> ...despite the recent statutory changes, the FEC's enforcement procedures still threaten serious unfairness and excessive expense to respondents...these procedures violate the two principles of 'First Amendment due process' promotion of accurate determinations and avoidance of unnecessary defense costs. (citing, Monaghan, First Amendment Due Process, 83 Harv. L. Rev. 518 (1970))

Id. at p. 1200.

The Gramm Committee has already expended large amounts of money for legal and accounting services to respond to the Mobley

9904074393 7

complaint. To add the additional costs and expenses of an audit without reason or cause and in derogation of the express statutory time contraints amounts to such denial of due process.

It has often been stated that a political campaign committee is the very essence of the exercise of First Amendment rights. To the extent that the Commission curtails or impacts on such committees their actions are subject to "strict scrutiny" and a demonstrable overriding public interest must be shown. Here the Commission and the OGC have failed to comply with such strict scrutiny and the record is devoid of a public interest justifying the proposed action.

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Conclusion

For the factual reasons stated in the motion in this cause and for the legal reasons in this memorandum Respondents respectfully request that the Commission reconsider its actions of March 5, 1985 and proceed with conciliation of the issues between the parties.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener

James F. Schoener
Counsel to Respondents
1015 15th Street, N.W., Suite 1200
Washington, D.C. 20005
202/789-8640

Dated: May 6, 1985

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
M.N. Bostick	)	MUR 1837
	)	
	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter arises out of a complaint filed by Ms. Donna Mobley of Austin, Texas against the Friends of Phil Gramm ("the Committee") and 171 other individuals and committees, including Mr. M.N. Bostick. The complaint raised the possibility of excessive contributions because these 171 respondents made primary contributions after the date of the primary and at a time when the Committee was not reporting a primary debt.

Responding to notification of the complaint, Mr. Bostick admitted contributing a total of $1250 to the Committee, but stated these were not personal contributions, "but a political contribution by KWTX Broadcasting Company", a Texas Corporation ("the Corporation"). The Commission, therefore, determined on March 5, 1985 that there is reason to believe Mr. Bostick violated 2 U.S.C. § 441f by permitting KWTX Broadcasting Company to use his name to effect a contribution made by the corporation.1/

Both Mr. Bostick and the Corporation have responded to the Commission's findings, with Mr. Bostick submitting a response on

1/ On this date the Commission also determined that there is reason to believe the Corporation violated 2 U.S.C. §§ 441b and 441f. Although the Corporation responded to the Commission's finding, it did not request pre-probable cause conciliation. The Corporation indicates it may do so at a later date.

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behalf of the Corporation. Mr. Bostick's response states that he and his spouse attended a dinner dance for Senator Gramm, purchasing 10 tickets at a cost of $125 each. Asserting these contributions were joint spousal contributions, Mr. Bostick questions whether he violated the Act.2/ This Office notes Mr. Bostick's second response fails to repeat his earlier assertion that the Corporation was the source of these contributions. The Corporation's response, however, indicates it paid Mr. Bostick for the contribution, but was reimbursed by this individual following the Commission's reason to believe finding. Mr. Bostick now requests pre-probable cause conciliation.

II. LEGAL ANALYSIS

The Act defines contributions to include anything of value made by any person for the purpose of influencing a federal election. 2 U.S.C. § 431(8)(A)(i). Persons are prohibited from making contributions in the name of another or knowingly permitting their name to be used to effectuate such a conntribution. 2 U.S.C. § 441f.

Responses indicate Mr. Bostick purchased the dinner tickets from the Committee. Subsequently, the Corporation reimbursed Mr. Bostick for the price of the tickets. Nevertheless,

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2/ The Committee reported the $1250 contribution as $1000 for the general election and $250 towards the primary, with only Mr. Bostick's name listed as a contributor. This apparently is an additional instance of the Committee failing to properly report and properly designate spousal contributions. See 1837 General Counsel's Report signed February 26, 1985 at 26-31. This problem will be further addressed at the completion of the Gramm audit.

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Mr. Bostick's name was used as the source of the contributions. Therefore, Mr. Bostick permitted KWTX Broadcasting Company to use his name to effect a contribution made by the corporation.

Stating the Corporation was repaid for the contribution, Mr. Bostick incorrectly assumes the repayment's effect is to erase the violation. Refunding such an illegal contribution is a mitigating factor, but does not obviate the violation. Moreover, it is apparent that a refund to the Corporation does not change the fact that Mr. Bostick initially permitted his name to be used to effectuate the contribution.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Enter into conciliation with Mr. M.N. Bostick prior to a finding of probable cause to believe.

2. Approve the attached proposed conciliation agreement.

3. Approve and send the attached letter.

Charles N. Steele
General Counsel

May 8, 1985
Date

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

Attachment
1. Proposed Conciliation Agreement
2. Letter to Respondent
3. Respondent's Request for Pre-Probable Cause Conciliation
4. Response of KWTX, dated April 11, 1985
5. Response of M.N. Bostick dated

8204074394 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
M.N. Bostick) MUR 1837

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 14, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1837:

1. Enter into conciliation with Mr. M.N. Bostick prior to a finding of probable cause to believe.

2. Approve the proposed conciliation agreement submitted with the General Counsel's Report signed May 8, 1985.

3. Approve and send the letter attached to the General Counsel's Report signed May 8, 1985.

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

Attest:

5-14-85
Date

Jody C. Ransom
Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 5-9-85, 8:26
Circulated on 48 hour tally basis: 5-9-85, 4:00

8204074339 43

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 16, 1985

Mr. M.N. Bostick
c/o KWTX Broadcasting Co.
Waco, Texas 76710

RE: MUR 1837

Dear Mr. Bostick:

On March 3, 1985, the Commission found reason to believe that you violated 2 U.S.C. § 441f. At your request, the Commission determined on May 14 , 1985, 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 you agree with the provisions of the enclosed agreement, please sign and 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 Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
KWTX Broadcasting Company) MUR 1837
)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On November 1, 1984, the Office of the General Counsel received a complaint from Ms. Donna Mobley of Austin, Texas against the Friends of Phil Gramm ("the Committee") and 171 other persons, including Mr. M.N. Bostick. The complaint alleged the Committee failed to continuously report its outstanding primary debts, or alternatively, alleged the Committee accepted excessive contributions by receiving primary contributions after the date of the primary at a time when the Committee lacked a primary debt.

Responding to notification of the complaint, Mr. Bostick denied making an excessive contribution. Instead, he asserted his $1250 contribution "was not a personal contribution, but a political contribution by KWTX Broadcasting Company," ("the Corporation"). Mr. Bostick is president of this Corporation. Accordingly, on March 5, 1985, the Commission determined that there is reason to believe the Corporation violated 2 U.S.C. §§ 441b and 441f. Following communications with this Office, the Corporation requests pre-probable cause conciliation.1/ As discussed below, this Office recommends the Commission grant this request.

1/ Mr. Bostick requested pre-probable cause conciliation in his personal capacity on April 15, 1985.

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II. LEGAL ANALYSIS

The Act defines a contribution to include anything of value made with the purpose of influencing a federal election. 2 U.S.C. § 431(8)(A)(i). The Act prohibits a corporation from making contributions to a federal election from its general treasury funds. 2 U.S.C. § 441b. Additionally, the Act prohibits persons from making contributions in the name of another. 2 U.S.C. § 441f.

The initial response of Mr. Bostick indicates KWTX Broadcasting Company, Inc. was the source of a contribution to the Committee. Upon receiving the Commission's reason to believe notification, Mr. Bostick returned the amount of the contribution to the Corporation. Thus, the Corporation argues the effect of this return eliminates the violation, and permits Mr. Bostick to be named as the source of a personal contribution. Alternatively, the Corporation asserts even if a violation occurred, this violation was inadvertent and "without advance notice."

Despite the Corporation's protestations, the Corporation advanced money from its general treasury funds with the purpose of influencing a federal election. Additionally, the Corporation used the name of Mr. Bostick to conceal this fact. Consequently, the KWTX Broadcasting Company, Inc. made a prohibited corporate contribution, and made this contribution in the name of another.

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III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

RECOMMENDATIONS

1. Enter into conciliation with the KWTX Broadcasting Corporation prior to a finding of probable cause to believe.

2. Approve the attached proposed conciliation agreement.

3. Approve and send the attached letter.

Charles N. Steele
General Counsel

May 13, 1985
Date

By: [signature]
Kenneth A. Gross
Associate General Counsel

Attachments
1. Proposed Conciliation Agreement
2. Letter from M.N. Bostick dated November 26, 1984
3. Letter from M.N. Bostick dated April 11, 1985
4. Letter from KWTX Corporation dated April 11, 1985
5. Letter from KWTX Corporation dated April 26, 1985
6. Proposed Letter

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1837
KWTX Broadcasting Company)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 16, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1837:

1. Enter into conciliation with the KWTX Broadcasting Company prior to a finding of probable cause to believe.

2. Approve the proposed conciliation agreement submitted with the General Counsel's Report signed May 13, 1985.

3. Approve and send the letter attached to the General Counsel's Report signed May 13, 1985.

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

Attest:

5-17-85
Date

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

Received in Office of Commission Secretary: 5-13-85, 11:39
Circulated on 48 hour tally basis: 5-14-85, 11:00

8904074359 48

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 10, 1985

Mr. M.N. Bostick, President
KWTX Broadcasting Company
P.O. Box 7528
Waco, Texas 76710

RE: MUR 1837
KWTX Broadcasting Company, Inc.

Dear Mr. Bostick:

On March 5, 1985, the Commission found reason to believe that The KWTX Broadcasting Company, Inc. violated 2 U.S.C. §§ 441b and 441f. At your request, the Commission determined on May 16, 1985, 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 the Corporation agrees with the provisions of the enclosed agreement, please sign and 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 Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1985

Mr. John P. Baxter, Treasurer
Friends of Phil Gramm
2355 Stemmons Freeway
Suite 503
Dallas, Texas 75207

Dear Mr. Baxter:

On March 5, 1985, the Commission voted to undertake an audit of your committee pursuant to Section 437g(a)(2) of Title 2 of the United States Code. This determination was based on information ascertained in the Commission's normal course of carrying out its supervisory responsibilities as provided for in the Federal Election Campaign Act of 1971, as amended ("the Act").

The audit will include a review of the committee's disclosure reports for completeness and mathematical accuracy; reconciliation of bank accounts; review of individual receipt and disbursement transactions for compliance with limitations and reporting requirements; an analysis of debts and obligations; and such other audit procedures as deemed necessary.

The Commission would like to commence the audit on June 10, 1985.

A member of the Commission's audit staff will contact you by telephone to arrange a mutually agreeable date to begin the audit and to establish a convenient location for the audit. If your committee should be unable to provide a convenient work space for four (4) auditors, the staff person will arrange for adequate work space at the Commission's expense.

The committee's financial records from July 1, 1983 through the last report required to be filed by the committee, including bank statements, together with deposit slips and cancelled checks; all contribution records; loan records; journals and/or ledgers maintained by the committee; the committee's by-laws and/or charter and minutes of meetings, if any; and the committee's solicitation material; brochures and other publications should be available for inspection when the audit begins. Certain records and other documents, although dated outside the audit period, may be requested if they relate to activity during the period audited.

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If you have any questions concerning any of the matters discussed above, please do not hesitate to contact Mr. Martin Favin or Mr. Thomas J. Nurthen at (202) 523-4155 or toll free at (800) 424-9530.

Sincerely,

Robert J. Costa
Assistant Staff Director
for the Audit Division

CERTIFIED MAIL:
RETURN RECEIPT REQUESTED

9904074395 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Friends of Phil Gramm and John Baxter, as treasurer	)	MUR 1837
	)	
	)	

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND

The Office of the General Counsel received a complaint on November 1, 1984, from Ms. Donna Mobley of Austin, Texas. Alleging violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), the complaint cited as violators Senator Phil Gramm, the Friends of Phil Gramm ("the Committee"), the treasurer and assistant treasurer of the Committee, John Baxter and Ruth Cymber and 170 other persons. Forming the basis of the complaint's allegations was the failure of the Committee to report and itemize its outstanding debts and obligations on the 1984 July and October Quarterly Reports.

Addressing the matters raised in the complaint and in responses, on March 5, 1985 the Commission found reason to believe that a number of violations may have occurred. Specifically, the Commission found reason to believe the Committee and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(8) by failing to continuously report outstanding debts and obligations. Additionally, the Commission found reason to believe the Committee and its treasurer violated 2 U.S.C. § 434(b)(5)(A) by failing to properly report expenditures. The Commission also found reason to believe that the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. §102.17 by failing to abide by the

joint fundraising regulations. Moreover, the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. § 44la(f) by accepting contributions exceeding the Act's limitations and by accepting contributions without proper designations. The Commission also found reason to believe the Committee and Mr. Baxter, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) by failing to correctly and fully identify contributors. Finally, because of the complexity of the documentation in this matter, the Commission also determined to refer the Committee to the Audit Division.

Filing two responses to the Commission's reason to believe determinations, the Respondents attempt to raise legal and factual objections to these determinations.1/ In its First Response, the Committee argues, in large part, it should have been afforded an opportunity to meet with the Office of the General Counsel2/ and that many of the Commission's findings exceeded the scope of the complaint. Following discussions with staff regarding the propriety of the First Response, Counsel for the Respondent indicated this motion for Reconsideration would

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1/ The first, received March 27, 1985, is entitled "Response" to the General Counsel's Factual and Legal Analysis ("the First Response"). The other, received May 6, 1985 is entitled "Respondents' Motion for Reconsideration of Commisson's Action of March 5, 1985" ("the Motion for Reconsideration").

2/ Counsel for Respondents did offer to meet with the Office of the General Counsel, with this Office agreeing to such a meeting if specific questions arose.

follow. Accordingly, this Report focuses on the issues and arguments raised in the Motion for Reconsideration.3/ As discussed below, the Office of the General Counsel recommends the Commission deny this motion as a matter of law for three reasons.

First, Respondents' Motion should be denied because it is without any legal basis. The enforcement process is governed by the stated procedures of 2 U.S.C. § 437g. These contain no procedure, express or implied, for a reconsideration of a Commission determination that there is reason to believe the Act has been violated. The absence of such a procedure indicates Congressional intent that a finding of reason to believe is a preliminary threshold for investigation. Purported defenses such as those Respondents attempt to raise, are properly brought to the Commission's attention as additional information for consideration in response to the reason to believe finding and in briefs discussing probable cause.

Second, even if the Commission addresses the Respondents' arguments that an aduit is time-barred, the Respondents are incorrect as a matter of law. Citing 2 U.S.C. § 438(b), Respondents state an audit must commence no more than 30 days after being certified by the Commission and no later than six months after a general election. Respondents ignore the Commission's explicit notification that an audit pursuant to

3/ Because of the scope of the Motion for Reconsideration, this Office assumes Mr. Schoener acts only in his capacity as counsel for the Committee and its treasurer, despite his dual role as counsel for many of the other notified respondents in this matter. Accordingly, it is presumed that this motion does not argue for reconsideration of the Commission's determinations to take no action against these other respondents or to find no reason to believe that they violated the Act.

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2 U.S.C. § 437g will be conducted. Such an audit is not governed by the particularized requirements of a § 438(b) audit. Instead, a § 437g(a)(2) audit has no such time limitations, and is subject only to the provisions of that section, i.e. enforcement procedures. 2 U.S.C. § 437g(a)(2). 11 C.F.R. § 104.16(c). Accordingly, Respondents' assertion that the audit is time barred is a misapplication of law and is without merit.

Finally, Respondents' claim that the Commission's findings cannot stand because they are outside the scope of the complaint is incorrect as a matter of law. The Commission's findings were based on matters in the complaint as well as internally generated matters arising from responses to this complaint. Respondents had a full and fair opportunity to respond to the complaint. Consistent with the Commission's practices in such matters, Respondents received a 10 page Legal and Factual Analysis discussing the basis of the Commission's internally generated findings. Thus, the Commission has fully complied with the Act and its procedures.

Respondents also attempt to raise a variety of substantive issues in their responses. As previously discussed, the merits of these arguments are properly addressed at a later stage of this investigation. Accordingly, upon the completion of the authorized audit, this Office will report to the Commission concerning the Respondents' additional arguments and the Audit findings.

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RECOMMENDATIONS

1. Deny the Motion to Reconsideration of Commission's Action of March 5, 1985 brought by the Friends of Phil Gramm and John Baxter, as treasurer.

2. Approve the attached letter.

Charles N. Steele
General Counsel

May 20, 1985
Date

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

Attachments
1. Committee's First Response
2. Motion for Reconsideration
3. Letter

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1837
The Friends of Phil Gramm	)	
John Baxter, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 24, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1837:

1. Deny the Motion to Reconsideration of Commission's Action of March 5, 1985 brought by the Friends of Phil Gramm and John Baxter, as treasurer.

2. Approve the letter attached to the General Counsel's Report signed May 20, 1985.

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

Attest:

5-24-85
Date

Jody C. Ransom
for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 5-21-85, 2:57
Circulated on 48 hour tally basis: 5-22-85, 11:00

8904074557

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 28, 1985

James F. Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

RE: MUR 1837
The Friends of Phil Gramm
and John Baxter, as treasurer

Dear Mr. Schoener:

This is in response to your response filed with the Commission entitled "Motion For Reconsideration of Commission's Action of March 5, 1985." The Commission has considered this motion and has determined not to grant it.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074358

GCH 7606

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005
TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

May 24, 1985

JAMES F. SCHOENER
(202) 789-8643

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
'85 MAY 28 P4:30

HAND DELIVERED

John B. McGarry, Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: M.U.R. No. 1837

Dear Mr. Chairman:

On May 6, 1985, I sent to your Commission, as well as to the General Counsel's office, a motion to reconsider action of the Commission taken on March 5, 1985, which called for an audit of the Friends of Phil Gramm. To date I have not had an answer to the matters raised in that motion.

Yesterday, May 23, 1985, the treasurer of the Friends of Phil Gramm received the attached letter indicating that the auditing department was apparently planning to pursue an audit despite the statutory time constraints. No copy of such letter was received by me, although I have entered my appearance in this file as required by 11 C.F.R. §111.23.

I will advise my client to refuse to make materials and records available for such audit until the questions raised in my May 6 motion to reconsider are resolved.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener
Counsel for Friends of Phil Gramm

JFS/cb
Attachment
cc: Office of the General Counsel
Mr. Martin Favin
Mr. Thomas Nurthen

9004074359

MUR 1837
RECEIVED AT THE FEC

KWTX BROADCASTING COMPANY, INC.
4520 BOSQUE BLVD. P.O. BOX 7528 WACO, TEXAS 76710 PHONE 776-1330 AREA CODE 817

RECEIVED
OFFICE OF THE SECRETARY
85 JUN 3 P3:31

85 JUN 3 P1:14

KWTX-AM-FM-TV
WACO, TEXAS

KXII TV
ARDMORE, OKLAHOMA
SHERMAN, DENISON, TEXAS

KLFY TV
LAFAYETTE, LOUISIANA

KBTX TV
BRYAN, TEXAS

KNAL RADIO
VICTORIA, TEXAS

Reilly

May 31, 1985

Federal Election Commission
Washington, D. C. 20463

RE: MUR 1837
KWTX Broadcasting Company

To Whom It May Concern:

Re this referenced matter, I have your conciliation agreement and have reviewed this matter with Ms. Patty Reilly of your office.

KWTX Broadcasting Company did provide a check of $1,250.00 to its president as an advance toward the purchase of ten tickets to a dinner held by Friends of Phil Gramm. Upon being advised that a corporation could not make a donation, this money was immediately refunded to the corporation. When subsequently reviewed by its Board of Directors, the Board confirmed that the advance was unauthorized and that no payment of this nature would be authorized.

KWTX Broadcasting Company has made no political contributions heretofore. The request for this advance was made by its president without any knowledge of the Federal Election code, and upon learning that it was, in fact, a violation, immediately repaid the advance. This was not an overt attempt to circumvent any election regulation, or to conceal any contribution. All actions concerning this matter have been open and forthright. I do not feel that any penalty in connection with this matter serves any purpose. There was no intent to violate any law from the inception. There was no attempt to conceal, and with or without a penalty, this corporation will not knowingly violate any regulation of any constituted authority. In an effort to settle this matter, however, and as a result of a telephone conversation with Ms. Patty Reilly, I am offering to accept a penalty of $200.00.

Sincerely yours,

KWTX BROADCASTING COMPANY

M. N. Bostick

M. N. Bostick
President

Encl: Check photocopies

2204074339660

VENDOR NUMBER	DATE	INVOICE NUMBER	DESCRIPTION	GL ACCOUNT NO.	AMOUNT
0067	11/20/84	112084	MN BOSTICK/F Graham Dinner	[illegible]	1,250.00

AMERICAN NATIONAL BANK

Loop 340 at Highway 84 • Post Office Box 7732 • Waco, Texas 76710

07595

KWTX BROADCASTING COMPANY, INC.

4520 BOSQUE BLVD. P.O. BOX 7528 WACO, TEXAS 76710 PHONE A/C 817 776-1330

48-1036
1119

DATE 11/20/84

AMOUNT $***1,250.00

ONE THOUSAND TWO HUNDRED FIFTY AND NO/100 DOLLARS

PAY TO THE ORDER OF

M.N. BOSTICK

NON-NEGOTIABLE

KWTX BROADCASTING COMPANY, INC.

8904074396 1

CTAD 438

BUDDY BOSTICK 0583
SPECIAL
P. O. BOX 7528 PH. 776-1330
WACO, TEXAS 76710

10 Oct 1984

PAY TO THE ORDER OF Gramm Appreciation Dinner $ 1250 00

One Thousand Two hundred Fifty & 00/100 DOLLARS

OCT 12 84

AMERICAN NATIONAL BANK
Loop 340 at Highway 84 ★ Post Office Box 7732 ★ Waco, Texas 76710

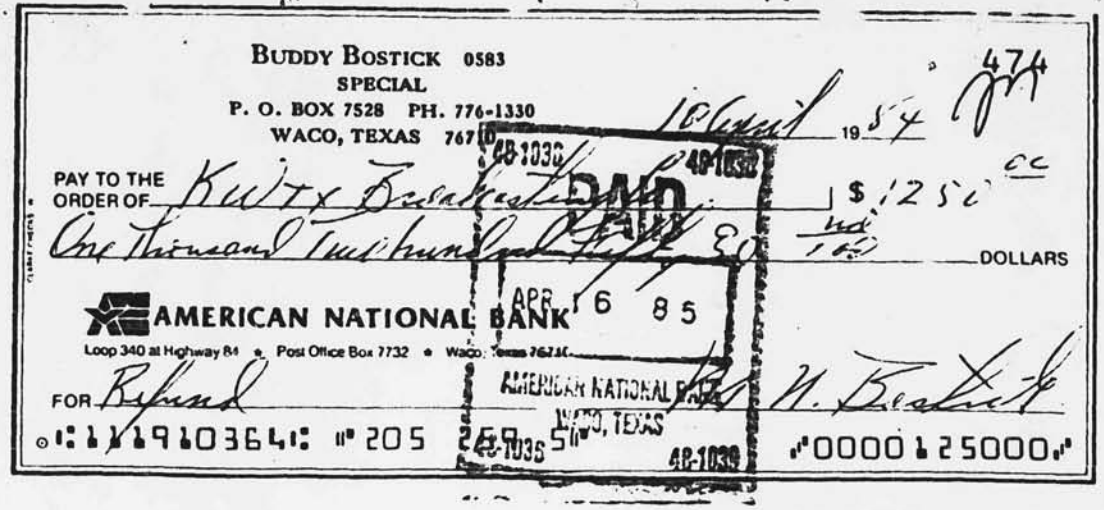
FOR M. N. Bostick

⑆111910364⑆ ⑈205 259 5⑈ ⑈0000125000⑈

8 9 0 4 0 7 4 3 9 6 2

1216 8 7 5 8

PAY TO THE ORDER OF TRINITY
FOR OFFICE
A NON-PROFIT WASHINGTON
P.R.B. DALLAS
1110-6083-6



BUDDY BOSTICK 0583
SPECIAL
P. O. BOX 7528 PH. 776-1330
WACO, TEXAS 76710

474

10 April 1984

PAY TO THE ORDER OF KWTX Broadcasting $ 1250 00

One Thousand Two hundred Fifty 80/100 DOLLARS

AMERICAN NATIONAL BANK
Loop 340 at Highway 84 • Post Office Box 7732 • Waco, Texas 76710

FOR Refund

N. Bostick

⑆111910364⑆ ⑈205 269 5⑈ ⑈0000125000⑈

PAID
APR 16 85
AMERICAN NATIONAL BANK
WACO, TEXAS

FOR DEPOSIT ONLY
AMERICAN NATIONAL BANK
WACO, TEXAS
K.W.T.X. BROADCASTING CO.
122 600 0

8 9 0 4 0 7 4 3 9 6 3

6CC7666
THE FEC

RECEIVED
OFFICE OF
GENERAL COUNSEL
85 JUN 4 A10:34

KWTX BROADCASTING COMPANY, INC.
4520 BOSQUE BLVD. P.O. BOX 7528 WACO, TEXAS 76710 PHONE 776-1330 AREA CODE 817

KWTX-AM-FM-TV
WACO, TEXAS

KXII TV
ARDMORE, OKLAHOMA
SHERMAN, DENISON, TEXAS

KLFY TV
LAFAYETTE, LOUISIANA

KBTX TV
BRYAN, TEXAS

KNAL RADIO
VICTORIA, TEXAS

85 JUN 4 A11:41
RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAL SERVICE
85 JUN 4 A11:06

May 31, 1985

Federal Election Commission
Washington, D. C. 20463

RE: MUR 1837

To Whom It May Concern:

I am in receipt of your conciliation agreement MUR 1837 in the matter of M. N. Bostick. The contents of your conciliation agreement have been reviewed by phone with Ms. Patty Reilly, an employee of the Federal Election Commission.

Any violation in connection with this matter is a result of not having been informed of the contribution regulations concerning federal elections. A check was given for $1,250.00 for the purchase of ten tickets for a dinner to support the campaign of Phil Gramm for United States Senate from Texas. When my wife and I arrived at the dinner, I wrote a check for $1,250.00. The checking account is a joint account. My signature and my wife's signature are both on the account and there are no individual limitations. The listing of the contribution by the Friends of Phil Gramm was in the name of M. N. Bostick. I had no control of that. I did not request that it be listed in that manner, nor was I consulted. Texas is a community property state. My wife and I could have contributed as much as $2,000.00 without any violation. We contributed $1,250.00. There was in this matter, in principle and in fact, no violation.

My wife and I are not regular contributors to political campaigns. We have heretofore had no contact with rules and regulations of the Federal Election Commission. I cannot believe that any laws governing contributions to political candidates were intended to penalize interested citizens who had no intent of circumventing any established rules. Any action concerning this matter was without any intent, and was a result of being unaware of governing regulations. Although I see no purpose to be served by a penalty, I have stated to Ms. Patty Reilly that I will be willing to pay $200.00 to conclude this matter.

Sincerely yours,

M. N. Bostick

M. N. Bostick

Encl: Check photocopies

2004074564

VENDOR NUMBER	DATE	INVOICE NUMBER	DESCRIPTION	GL ACCOUNT NO.	AMOUNT
00[illegible]	11/20/84	112084	M.N. BOSTICK/Graham Dinner	T 8380	1,250.00

AMERICAN NATIONAL BANK

07595

KWTX BROADCASTING COMPANY, INC.

4520 BOSQUE BLVD. P.O. BOX 7528 WACO, TEXAS 76710 PHONE A/C 817 776-1330

48-1036
1119

DATE 11/20/84

AMOUNT $***1,250.00

ONE THOUSAND TWO HUNDRED FIFTY AND NO/100 DOLLARS

PAY TO THE ORDER OF

M.N. BOSTICK

NON-NEGOTIABLE

KWTX BROADCASTING COMPANY, INC.



433

BUDL BOSTICK 058
SPECIAL
P. O. BOX 7528 PH. 776-1
WACO, TEXAS 76710

10 Oct 1984

PAY TO THE ORDER OF Gamm Appreciation Dinner $ 1250.00

One Thousand Two hundred Fifty & 00/100 DOLLARS

OCT 12 84

AMERICAN NATIONAL BANK
Loop 340 at Highway 84 • Post Office Box 7732 • Waco, Texas 76710

FOR M. N. Bostick

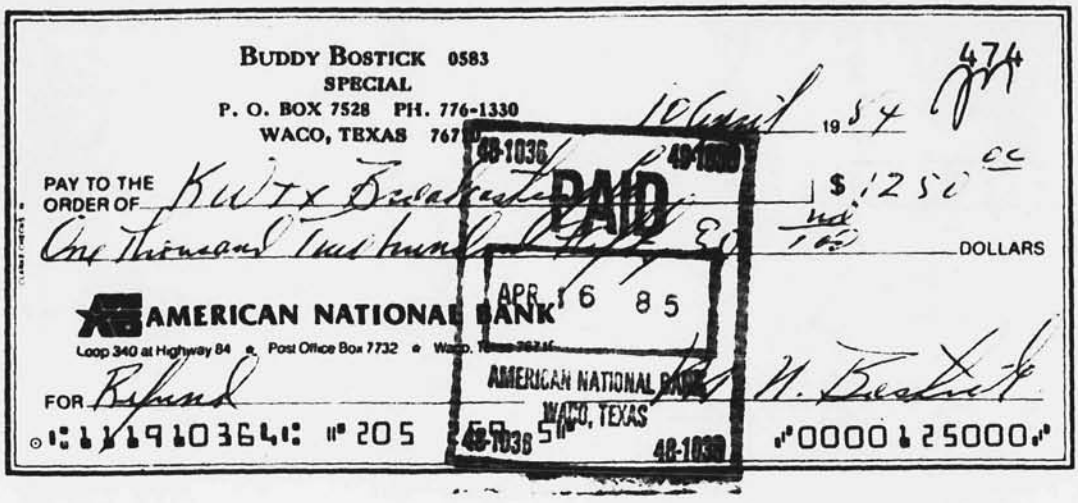
⑆111910364⑆ ⑈205 259 5⑈ ⑈0000125000⑈

8 9 0 4 0 7 4 3 9 6 6

0211119

PAY TO THE ORDER OF TRINITY
FOR GENERAL
A NON-PROFIT WASHINGTON D.C. CORP
GENERAL ELECTRIC
F.R.B. DALLAS
1110-0003-8

1216 8 7 5 8



BUDDY BOSTICK 0583
SPECIAL
P. O. BOX 7528 PH. 776-1330
WACO, TEXAS 767[illegible]

474

10 April 1984

PAY TO THE ORDER OF KWTX Broadcasting $ 1250 00

One Thousand Two hundred Fifty Eo 00/100 DOLLARS

AMERICAN NATIONAL BANK
Loop 340 at Highway 84 • Post Office Box 7732 • Waco, Texas 767[illegible]

FOR Refund

PAID
APR 16 85
AMERICAN NATIONAL BANK
WACO, TEXAS
48-1036 48-1036

⑆111910364⑆ ⑈205 [illegible] ⑈ ⑈0000125000⑈

FOR DEPOSIT ONLY
AMERICAN NATIONAL BANK
WACO, TEXAS 3 4 4
K.W.T.X. BROADCASTING CO.
122 600 0

8 9 0 4 0 7 4 3 9 6 7

GCC #7711

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1862-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

Reilly

85 JUN 11 A9:24

MUR 1837

JAMES F. SCHOENER
(202) 789-8643

June 5, 1985

85 JUN 11 P1:41

RECEIVED
GENERAL COUNSEL

Robert J. Costa, Director
Audit Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Friends of Phil Gramm

Dear Mr. Costa:

Your audit team headed by Mr. Martin Favin was assigned to audit my client, Friends of Phil Gramm. Mr. Stan Huckaby, a CPA from Austin, Texas, is presently completing a total review for the committee and will require about three weeks to complete his work. Amendments to previously filed reports will probably be filed at that time. Therefore, it is highly inconvenient to commence your proposed audit on June 10. We, therefore, request that you delay your program from that date.

Since the Friends of Phil Gramm has made every attempt to correct such errors as were discovered in our extensive (and expensive) review by Mr. Huckaby, and we believe the proposed audit would entail unnecessary expenditures on both your commission and our committee, we are reserving the right to seek judicial assistance to enjoin and prevent such actions under 2 U.S.C. §438(b) and other provisions of the F.E.C.A.

Please call me at 789-8640 as soon as a decision is made on this request.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener

JFS/cb
cc Charles N. Steele, Esq.
Ms. Patty Reilly
Mr. Stan Huckaby
Mr. John Baxter

8204074396 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

HAND DELIVERED

James Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

June 7, 1985

RE: MUR 1837
The Friends of Phil Gramm
and John Baxter, as
treasurer

Dear Mr. Schoener:

This letter confirms your telephone conversation of June 7, 1985 with Patty Reilly of this Office regarding extensions of time to commence an audit in the above-captioned MUR and your intention to seek "judicial assistance" in this matter.

The Office of the General Counsel acknowledges the receipt of your letter requesting a three week extension for the date of the start of the audit, currently scheduled for June 10, 1985. This Office will grant a one week extension until June 17, 1985, in order to provide time for the Commission to entertain your request. Should the Commission determine to grant an additional extension, you will be so notified.

If you have any questions please contact Patty Reilly, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

2904074369

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

85 JUN 10 A 9:28

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 10, 1985

EXECUTIVE SESSION

MEMORANDUM

TO: THE COMMISSION

FROM: CHARLES N. STEELE
GENERAL COUNSEL

BY: KENNETH A. GROSS
ASSOCIATE GENERAL COUNSEL

SUBJECT: REQUEST FOR EXTENSION OF TIME IN MUR 1837

Because the audit of the Respondents in the above-captioned matter was scheduled to begin on June 10, 1985, this extension of time request must be considered immediately. Accordingly, this Office requests that the attached report be considered as a late submission to the agenda of June 11, 1985.

8904074 3970

BEFORE THE FEDERAL ELECTION COMMISSION

EXECUTIVE SESSION

In the Matter of	)	
	)	JUN 11 1985
The Friends of Phil Gramm and John Baxter, as treasurer	)	MUR 1837
	)	

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND

The Office of the General Counsel received a complaint on November 1, 1984, from Ms. Donna Mobley of Austin, Texas. Alleging violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), the complaint cited as violators Senator Phil Gramm, the Friends of Phil Gramm ("the Committee"), the treasurer and assistant treasurer of the Committee, John Baxter and Ruth Cymber, and 170 other persons. Forming the basis of the complaint's allegations was the failure of the Committee to report and itemize its outstanding debts and obligations on the 1984 July and October Quarterly Reports.

Addressing the matters raised in the complaint and in responses, on March 5, 1985, the Commission found reason to believe that a number of violations may have occurred. Additionally, because of the complexity of the documentation in this matter, the Commission also determined to refer the Committee to the Audit Division for an audit pursuant to 2 U.S.C. § 437g(a)(2).

Responding to notification of the Commission's findings, Respondents submitted a "Response to General Counsel's Factual and Legal Analysis," on March 27, 1985. Informed that substantive issues raised in this response would not be considered until the completion of the audit, on May 6, 1984, the Respondents filed a response entitled "Motion For Reconsideration

8204074 3971

of Commission's Action of March 5, 1985." The Commission denied this motion on May 24, 1985.

Contacted by the Audit Division on May 23, 1985, Counsel for Respondents refused to make any materials or records available to the auditors and refusesd to make plans for the audit pending the Commission's decision on the Motion to Reconsider. Responding to notification of the Commission's denial, counsel requests the audit be delayed "about three weeks."1/ The Office of the General Counsel recommends the Commission deny this request for two reasons.

First, the Committee has had actual notice of the Commission's decision to conduct an audit since March 7, 1985. Its preparation for the audit should have begun at that time.

Second, Counsel indicated in correspondence with the Commission that Respondents"... are reserving the right to seek judicial assistance to enjoin and prevent such action [the audit] under 2 U.S.C. § 438(b) and other provisions of the F.E.C.A." Furthermore, in conversation with the Commission staff, Counsel stated he intends to seek a court order enjoining the Commission from commencing the scheduled audit. Counsel made such

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

1/ Pending the Commission's decision regarding this three week extension, the Office of the General Counsel granted an limited extension until June 17, 1985. Counsel for the Respondent was so informed on June 7, 1985.

statements to staff of the Office of the General Counsel on several occasions, as well as to staff of the Audit Division.2/

In light of the representations made by Counsel, this office is concerned that the requested extension may be followed by judicial action initiated by respondents. This, in turn, will result in further delays in the commencement of the audit. Accordingly, this Office recommends that the Commission deny the requested extension. Additionally, it is recommended the Commission approve the attached subpeonas for the audit materials in the event the Respondents refuse access to the auditors on June 17, 1985, the date of the scheduled audit.

II. RECOMMENDATIONS

1. Deny the motion for an extension of time to The Friends of Phill Gramm and John Baxter, as treasurer.

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2/ In a June 7, 1985 telephone conversation with General Counsel staff, counsel indicated that Respondents would seek injuncture relief to prevent the start of the audit. Counsel indicated this motion would be filed on Wednesday or Thursday, June 12 or 13, 1985.

2. Approve the attached letter and subpoena.

Charles N. Steele
General Counsel

June 7, 1985
Date

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

Attachments
1. Respondents Request for an Extension
2. Proposed Letter
3. Subpeona
4. Letter to James Schoener of June 7, 1985.

8 9 0 4 0 7 4 3 9 7 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1837
The Friends of Phil Gramm and)
John Baxter, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 11, 1985, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in MUR 1837:

1. Grant an extension of time for the commencement of the audit of The Friends of Phil Gramm and John Baxter, as treasurer, until June 24, 1985, and direct the FEC Office of General Counsel to notify the respondent Committee that the audit will commence early on the date of June 24, 1985.

2. Approve the subpoena attached to the General Counsel's report dated June 7, 1985.

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

Attest:

6-12-85
Date

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

9204074397

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

HAND DELIVERED

June 12, 1985

James Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

Re: MUR 1837
The Friends of Phil Gramm and
John Baxter, as treasurer

Dear Mr. Schoener:

On March 7, 1985, your clients were notified that the Commission found reason to believe your clients violated a number of provisions of the Federal Election Campaign Act of 1971, as amended, as well as provisions of the Act's Regulations.

Specifically, the Commission found reason to believe the Committee and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(8) by failing to continuously report outstanding debts and obligations. Additionally, the Commission found reason to believe the Committee and its treasurer violated 2 U.S.C. § 434(b)(5)(A) by failing to properly report expenditures. The Commission also found reason to believe that the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 102.17 by failing to abide by the joint fundraising regulations. Moreover, the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. § 441a(f) by accepting contributions exceeding the Act's limitations and by accepting contributions without proper designations. The Commission also found reason to believe the Committee and Mr. Baxter, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) by failing to correctly and fully identify contributors. Finally, because of the complexity of the documentation in this matter, the Commission also determined to refer the Committee to the Audit Division for an audit pursuant to 2 U.S.C. § 437g(a)(2).

8204074397

On June 11, 1985, the Commission addressed your request that the commencement of the audit, originally scheduled for June 10, 1985, be delayed three weeks. The Commission determined to grant your clients an extension until June 24, 1985. Accordingly, the auditors will commence the audit on the morning of June 24, 1985.

A member of the Commission's audit staff will contact you by telephone to establish a convenient location for the audit. If your committee should be unable to provide a convenient work space for four (4) auditors, the staff person will arrange for adequate work space at the Commission's expense.

If you have any questions please direct them to Patty Reilly, the attorney handling this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

cc: Audit Division

8204074333777

GCC #7785

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
'85 JUN 20 A10:17

June 20, 1985

Ms. Patty Reilly, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

MUR 1837

Re: Friends of Phil Gramm

Dear Ms. Reilly,

As I informed you in a long distance telephone call from Dallas, yesterday afternoon, my clients have determined to seek a judicial determination of the question of the authority of the Commission to insist on a "full audit" of this committee after the expiration of the time constraints of the law and the regulations.

Accordingly, the complaint was filed late yesterday afternoon, but the certified copies were not ready for me before my airplane left. They will be sent up some time this morning and I will have them served on your Commission as soon as they arrive.

As I told you, in light of the pending suit contesting the audit, it would be useless to send your auditors to Dallas on Monday, June 24th. The treasurer, Mr. Baxter has been instructed not to meet with your people and the records requested will not be furnished.

As we have indicated from the first filing of the complaint in this matter, my clients would like to conciliate of the issues raised by the complaint and stand ready to enter into such conciliation as a part of pre trial efforts in the Texas court.

Very truly yours,

MILLER, CANFIELD, PADDOCK & STONE

By: James F. Schoener
James F. Schoener
Attorney for Friends of
Phil Gramm & John Baxter,
Treasurer

9204074978

GCC# 1799

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

BEFORE THE

FEDERAL ELECTION COMMISSION

'85 JUN 21 A10:07

In the Matter of:

THE FRIENDS OF PHIL GRAMM,
and
JOHN BAXTER, Treasurer of
FRIENDS OF PHIL GRAMM,

MUR 1837

_____/

To said Commission.

Now comes James F. Schoener, attorney for Friends of Phil Gramm and John Baxter, Treasurer of Friends of Phil Gramm, and moves this Commission to quash the attached subpoena issued in this matter for the following reasons:

1. The audit for which the subpoenaed materials are sought is barred by the lapse of time under the statute and regulations applicable thereto.

2. Prior to issuance of this subpoena, the Office of General Counsel had been advised verbally and by letter, that Friends of Phil Gramm and John Baxter had filed suit in the United States District Court for the Northern District of Texas seeking a declaratory judgment of the applicability of such statutes and regulations and said suit is presently pending.

3. That the materials sought by this subpoena are far beyond that necessary to investigate the matters involved in MUR 1837.

4. A petition for preliminary injunction in the aforesaid suit was filed on June 20, 1985 and pending decision on that motion, it is submitted that the action of the Commission would constitute an interference with the orderly process of justice and decisions necessary to decide this dispute.

8904074379
MILLER, CANFIELD, PADDOCK AND STONE

5. The actions of the Commission in issuance of this summons after knowledge of the filing of the complaint in the United States District Court is arbitrary, capricious, and constitutes a further, abuse of administrative power.

For the aforesaid reasons, Friends of Phil Gramm and John Baxter move that such subpoena be quashed forthwith.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK & STONE

By: James F. Schoener
James F. Schoener
Attorney for
Friends of Phil Gramm and
John Baxter, Treasurer

Dated June 21, 1985
Washington, D.C.

MILLER, CANFIELD, PADDOCK AND STONE
8904074399 80

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Friends of Phil Gramm and John Baxter, as treasurer	)	MUR 1837
	)	

JUN 1985
RECEIVED
M.C.P. & S.
1:10 p.m.

JUN 21 P12:58
GENERAL COUNSEL

SUBPOENA

To: John Baxter, treasurer
The Friends of Phil Gramm
c/o: James Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

PURSUANT To 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter pursuant to 2 U.S.C. § 437g(a)(2), the Federal Election Commission hereby subpoenas the below described documents and materials from the Friends of Phil Gramm pursuant to a Commision authorized audit in the above-captioned matter.

As used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean all tangible things by which human communication is transmitted or stored including the original, all copies, and drafts of writings of any kind, printed, visual, or electronic materials to be produced with respect to each of the requests enumerated herein. In particular, without limiting the generality of the foregoing, "documents and materials" include correspondence, memoranda, reports, minutes, pamphlets, notes, letters, discs, cassettes, telegrams, messages (including reports, notes, and memoranda of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, account statements, billing forms, receipts,

2074398

checks, solicitation materials, records and compilations. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any answers or documents which may be otherwise construed to be out of its scope.

3. The term "the Act" shall mean the Federal Election Campaign Act of 1971, as amended.

4. All references to "The Friends of Phil Gramm" or "the Committee," with respect to each of the requests and answers enumerated herein, include all persons, political committees, and other entities authorized to conduct business on behalf of the Friends of Phil Gramm.

The following lists the subpoenaed materials:

1. All Committee by-laws and charters.

2. All minutes of meetings which relate to the Committee's reporting responsibilities under the Act.

3. All Committee solicitation materials, including but not limited to brochures, flyers, letters and handouts.

3. All Committee financial records from July 1983 up to and including the last report required to be filed with the Commission by the Committee, including all amendments filed or anticipated to be filed to these reports

4. All documents and materials relating to the Committee's financial records, including but not limited to statements, deposit slips, and cancelled checks.

5. All documents and materials relating to contribution records.

6. All documents and materials relating to loan records.

7. All journals and ledgers maintained by the Committee relating to the Federal Election Campaign Act's reporting and record keeping requirements.

8204074399 82

8. All documents and materials relating to all transfers, receipts and contributions to the Committee from all other political committees maintained and established by any individual or individuals on behalf of Phil Gramm.

Notice is given that these materials must be made available to members of the Federal Election Commission's Audit Division at the Committee's Offices or at a mutually agreed location on June 28, 1985. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this, 20th day of June, 1985.

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

2024074393

file

GCC# 7805

MEMORANDUM

TO: CHERYL THOMAS TO: JOAN HARRIS

FROM: JOAN HARRIS FROM: CHERYL THOMAS

CHECK NO. 492 (a copy of which is attached) RELATING TO MUR 1937 AND NAME M. N. Bostick, Jr. WAS RECEIVED ON June 21, 1985. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

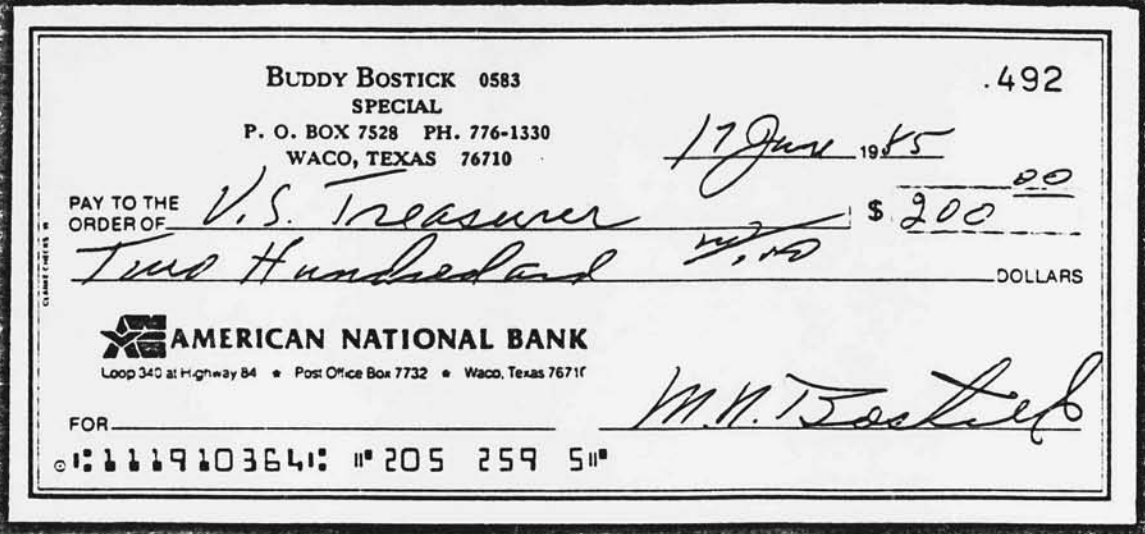
/✓/ BUDGET CLEARING ACCOUNT (#95F3875.16)

/ / CIVIL PENALTIES ACCOUNT (#95-1099.160)

/ / OTHER _____

SIGNATURE Otha L. Dixon DATE 6-21-85

8 9 0 4 0 7 4 5 9 3 4



BUDDY BOSTICK 0583
SPECIAL
P. O. BOX 7528 PH. 776-1330
WACO, TEXAS 76710

.492

17 June 1985

PAY TO THE ORDER OF V.S. Treasurer $ 200.00

Two Hundred and 00/100 DOLLARS

AMERICAN NATIONAL BANK
Loop 340 at Highway 84 ★ Post Office Box 7732 ★ Waco, Texas 76710

FOR

M.N. Bostick

⑆111910364⑆ ⑈205 259 5⑈

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

Submitted Late

85 JUN 24 P12: 18

EXECUTIVE SESSION
JUN 25 1985

June 24, 1985

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

SUBJECT: Late Submission to the Commission Agenda of June 25, 1985; MUR 1837

The Office of the General Counsel requests that the attached report be added to the Commission's June 25, 1985 agenda as a late submission. Litigation filed in Texas during the past week on this matter, and the due date of a Commission authorized subpoena, require immediate Commission attention.

Attachment

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Friends of Phil Gramm and John Baxter, as treasurer	)	MUR 1837
	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter arises from a complaint filed on October 31, 1984 by Ms. Donna Mobley of Austin, Texas against the Friends of Phil Gramm ("the Committee") and John Baxter, as treasurer, and 170 other persons. On March 5, 1985 the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), and 434(b)(3)(A). Additionally, the Commission found reason to believe the Committee and Mr. Baxter, as treasurer, violated 11 C.F.R. 102.17.*/ Because the Committee's responses, reports, and amendments contained a number of inaccuracies and inconsistencies, the Commission also authorized an audit of the Committee pursuant to 2 U.S.C. § 437g(a)(2).

Subsequently, Respondents filed a response disputing the Commission's findings. Additionally, on May 6, 1985 Respondents petitioned the Commission urging a reconsideration of the reason to believe findings. The Commission denied this motion on May 24, 1985. Four days before the scheduled date for commencing the audit, Respondents requested an extension of "about three weeks,"

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*/ The Committee was sent a ten page Factual and Legal Analysis outlining the bases for the Commission's findings with regard to the internally generated matters not specifically mentioned in the complaint.

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stating the June 10, 1985 audit date was "highly inconvenient" for the Committee. On June 11, 1985 the Commission granted a partial extension until June 24, 1985. The Commission also authorized a subpoena for the audit materials to be served in the event the auditors were denied access to these requested materials. Following a June 14, 1985 telephone conference with members of the Commission staff and Respondents, counsel for Respondents notified this Office on June 20, 1985 that he had advised his clients not to meet with the auditors and not to provide the requested information. Additionally, counsel stated he would file suit in Texas seeking a preliminary injunction and a declaratory judgment to bar the audit (Attachment 3). In light of counsel's written refusal to meet with the auditors or to provide requested materials, this Office delivered to counsel the subpoena authorized by the Commission at the June 11, 1985 meeting.

The Office of the General Counsel received copies of the Respondents' complaint on June 20, 1984. Late that same afternoon the Committee's Texas counsel called this Office, indicating an application for a temporary restraining order would also be filed in Texas on that day. Additionally, this Office was notified by the court that an informal judicial conference, mandated by local rules, would be held on June 21, 1985.

On the following morning, this Office received from Respondent's counsel a motion to quash the Commission's subpoena. That afternoon the Office of the General Counsel and the other parties conferred by telephone with the court. In the course

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of this conversation, this Office explained the status of this matter, informing the court that respondents had filed a motion to quash that same day. It was further explained to the court that if the Commission determined not to grant Respondents' motion to quash, the Commission is empowered to seek subpoena enforcement in District Court. Such an action would be the appropriate forum in which to address concerns the Respondents were attempting to adjudicate by their injunctions.

The judge did not grant the temporary restraining order. He further informed the parties he would not be able to hear any subpoena enforcement action until August or September, following his long planned vacation.

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II. MOTION TO QUASH

Respondents' motion advances five reasons why the Commission should quash the subpoena. As discussed below, the Office of the General Counsel recommends that the Commission deny Respondents' motion.

First, Respondents continue to assert the audit is time barred. Although their motion cites no legal authority for this proposition, Respondents apparently rely on their earlier argument that the time restrictions of 2 U.S.C. § 438(b) are applicable and have not been met. Respondents ignore that the Commission has authorized an audit pursuant to 2 U.S.C. § 437g(a)(2) as part of its investigation of this matter. Such enforcement audits are not subject to specific time restraints. Thus, Respondents' argument is without merit.

Second, Respondents assert that prior to the issuance of the challenged subpoena, the Office of the General Counsel knew of Respondents' filings in the Texas court. While true, the knowledge of this Office of the Texas actions has no relevancy to the subpoena Respondents seek to quash. The subpoena was issued only after it became obvious that Respondents would not voluntarily comply with requests for records and materials. This Office delivered the subpoena in an effort to continue this investigation as expeditiously as possible.

Additionally, Respondents erroneously assert the materials sought are beyond those necessary to investigate the matters involved in MUR 1837. Although not directly stated, Respondents appear to argue that review of any matters not alleged in the complaint is out of the scope of the Commission's investigation. Such an argument ignores the fact that the Commission has made reason to believe findings concerning both the complaint and internally generated matters in this MUR. Further, the Commission has complied with its notification procedures for informing Respondents of the bases for its findings and has provided Respondents an opportunity to respond to those findings. All materials sought in the subpoena are relevant to the Commission's investigation of these matters. All of the subpoenaed materials (except Item 8 regarding the unusual transfers received from the Committee from the Senator's defunct House committee) mirror the information routinely sought by the auditors at the initiation of an audit. Consequently, Respondents' argument fails.

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Fourth, Respondents assert the Commission's actions interfere with the "orderly process of justice." Respondents apparently are under a mistaken impression that their Texas complaint relieves the Commission of its obligation to continue this investigation in an expeditious manner. In fact, the Commission is obligated to continue this investigation until it decides otherwise or unless or until it is ordered by a court to cease investigating. Neither has occurred here.

Finally, Respondents allege the Commission's actions are arbitrary, capricious, and constitute an abuse of administrative power. Respondents appear to operate under additional mistaken impressions that their filing of civil actions insulate them from any further Commission actions and halts this investigation. Contrary to these beliefs, the mere filing of a complaint has never been interpreted as modifying either the Commission's statutory obligation to conduct expeditious investigations, or the Commission's use of subpoenas as a means of furthering these investigations.

In the instant case, once Respondents informed this Office that they would neither meet with the auditors nor turn over the requested records, the Commission was powerless to pursue its investigation unless and until the subpoena was served. Thus, this Office had no option but to subpoena these materials. The allegations Respondents attempt to raise to the Texas court are more properly raised in a subpoena enforcement proceeding. Accordingly, the Commission's use of a subpoena to expeditiously move this investigation forward was fully justified.

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In view of the foregoing, this Office recommends that the Commission deny Respondents' motion to quash the subpoena. Additionally, in light of Respondents' unequivocal assertions that they will not comply with this subpoena, this Office recommends that the Commission authorize the Office of the General Counsel to file suit for subpoena enforcement in the United States District Court in the event Respondents do not produce the required materials on June 28, 1985.

III. RECOMMENDATIONS

1. Deny the Motion to Quash the Commission's June 20, 1985 subpoena brought by the Friends of Phil Gramm and John Baxter, as treasurer.

2. Authorize the Office of the General Counsel to file suit for subpoena enforcement in the United States District Court if Respondents do not produce the subpoenaed materials on June 20, 1985.

3. Approve the attached letter.

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Charles N. Steele
General Counsel

June 24, 1985
Date

Kenneth A. Gross
Associate General Counsel

Attachments

1. Motion to Quash
2. Subpoena
3. Letter of June 20, 1985 from Respondents
4. Proposed Letter

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Friends of Phil Gramm and) MUR 1837
John Baxter, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 25, 1985, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1837:

1. Deny the Motion to Quash the Commission's June 20, 1985 subpoena brought by the Friends of Phil Gramm and John Baxter, as treasurer.

2. Authorize the Office of General Counsel to file suit for subpoena enforcement in the United States District Court if Respondents do not produce the subpoenaed materials on June 28, 1985.

3. Approve the letter attached to the General Counsel's report dated June 24, 1985.

Attest:

6/26/85
Date

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

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FEDERAL ELECTION COMMISSION

June 26, 1985

HAND DELIVERED

James Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

RE: MUR 1837
The Friends of Phil Gramm
and John Baxter, as
treasurer

Dear Mr. Schoener:

On June 25, 1985 the Federal Election Commission considered your motion to quash the subpoena directed towards your clients regarding the above-captioned matter. After evaluating the arguments presented in your motion, the Commission determined not to quash this subpoena. The Commission further advises you that in the event these materials are not produced on June 28, 1985, the Office of the General Counsel has been authorized to file civil suit for subpoena enforcement in the United States District Court. In order to avoid further litigation and delay in this matter, the Commission urges you to cooperate with this investigation.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at 523-4143.

Sincerely,

John Warren McGarry
Chairman

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RECEIVED BY THE FEC
GCC # 7857
85 JUN 27 A9:58

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

June 26, 1985

JAMES F. SCHOENER
(202) 789-8643

85 JUN 27 A11:18
GENERAL COUNSEL

Ms. Patty Reilly
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1837
Friends of Phil Gramm and John Baxter, treasurer

Dear Ms. Reilly:

Your letter of June 26 from the Chairman of your Commission denying our motion to quash the subpoena in this cause has been received. Please be advised that my clients will not produce the materials requested in that subpoena for the reasons stated in the Complaint on file in the pending litigation in the United States District Court for the Northern District of Texas (Cause No. 85-1164-F).

If you wish to restrict your request for materials to the matters alleged in the complaint filed in this MUR, please advise our office and we will be glad to furnish such materials. Obviously, that course would also avoid further litigation and delay.

If your office is unwilling to so restrict the scope of your subpoena, we assume you will file your enforcement proceeding in the near future.

Since you indicated a desire to expedite the hearing on the issues between our clients and your Commission, please advise if you will consent to expedited discovery and production of documents in advance of filing your answer.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener

JFS/cb
cc David N. Everett, Esq.

8904074929

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 5, 1985

David N. Everett, Esquire
Maxwell, Godwin & Carlton
1200 Diamond Shamrock Tower
717 North Harwood Street
Dallas, Texas 75201

James Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street, N.W.
Washington, D.C. 20006

RE: MUR 1837
The Friends of Phil Gramm
and John Baxter, as
treasurer

Dear Mr. Everett and Mr. Schoener:

The Office of the General Counsel is in receipt of your two letters both dated June 27, 1985 discussing the above-captioned matter. The first purports to "memorialize" a June 26, 1985 telephone conversation between ourselves and Ms. Rebecca Covell, Judge Porter's law clerk. The second discusses your request for "expedited discovery . . . to informally develop necessary facts" regarding your suit filed in the Northern District of Texas. This letter clarifies points raised by your correspondence.

First, regarding your discussion that a subpoena enforcement action somehow constitutes a compulsory response to the above-mentioned suit, be advised the Office of the General Counsel maintains the consistent position that a subpoena enforcement suit is an independent legal action conducted by the Commission pursuant to express statutory authorization. As such, it does not constitute any sort of compulsory response. Because the Court has indicated a determination of this issue will be made at a later date, we do not wish to engage in a debate on the merits at this time.

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Second, addressing the "somewhat minor point" of your second letter, this Office is bewildered by your apparent concern stemming from the June 26, 1985 telephone conversation between Ms. Covell and Ms. Lois Lerner of the Commission staff. During the June 21, 1985 conference call between the Court and the parties, this Office was requested by Judge Porter to inform the Commission that a hearing on the complaint would not be possible during the month of July and that matters would be "held in abeyance" until a later date. Pursuant to Judge Porter's instructions, this Office spoke with Ms. Covell on June 24, 1985, and stated that the Commission had been informed of the post-July hearing. Our conversation with Ms. Covell on that date, at the explicit request of the court, related solely to information relayed to the Commission. Although Ms. Covell did inquire whether the Commission would seek subpoena enforcement, Mr. Schoener had already been apprised of this possible action on an earlier phone call from Patty Reilly of this Office. In complying with the Court's request, it was not our intention to raise a specter of impropriety.

Third, addressing your request that informal expedited discovery be utilized, this Office is puzzled by this request in light of your First Request for Production of Documents received by us on July 2, 1985. It would appear that this document negates any sort of "informal discovery." Nevertheless, although this Office believes discoverv will be unnecessary in this case, we are willing to informally discuss issues relating to discovery including ascertaining what information you are seeking. These discussions should not be construed as a waiver of the right of the Office of the General Counsel to oppose any kind of formal discovery.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely

Ivan Rivera
Assistant General Counsel

cc: Honorable Robert Porter
Ms. Rebecca Covell

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RECEIVED
FEC
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
M. N. Bostick) MUR 1837

05 JUL 5 P3:22

GENERAL COUNSEL'S REPORT

SENSITIVE

Background

Attached is a conciliation agreement signed by Mr. M. N. Bostick.

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Recommendation

The Office of the General Counsel recommends that the Commission accept this agreement, approve the attached letter, and close the file regarding this respondent.

Charles N. Steele
General Counsel

July 2, 1985
Date

Kenneth A. Gross (RHT
Kenneth A. Gross
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Copies of cancelled checks
3. Copy of civil penalty check
4. Letter to Respondent

8904074399

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1837
M.N. Bostick	)	
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 10, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1837:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed July 2, 1985.
2. Approve the letter attached to the General Counsel's Report signed July 2, 1985.
3. Close the file regarding this respondent.

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

Attest:

7-10-85
Date

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

Received in Office of Commission Secretary: 7-5-85, 3:22
Circulated on 48 hour tally basis: 7-8-85, 11:00

8204074000

MAXWELL, GODWIN & CARLTON
ATTORNEYS AND COUNSELORS
A PROFESSIONAL CORPORATION
1200 DIAMOND SHAMROCK TOWER
717 NORTH HARWOOD STREET
DALLAS, TEXAS 75201

DAVID N. EVERETT

TELEPHONE: 214 742-4422
TELECOPIER: 214 760-7332
TELEX: 709618 MG+C UD
D/FW METRO: 263-1186

July 9, 1985

Ivan Rivera, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: Friends of Phil Gramm, et al., v.
Federal Election Commission, et al.,
In the United States District Court
for the Northern District of Texas
at Dallas, Cause No. CA3-85-1164-F,
The Honorable Robert W. Porter, Judge.

RE: MUR 1837-The Friends of Phil Gramm and
John Baxter, as Treasurer

Dear Mr. Rivera:

Enclosed is correspondence copied to the Court in response to your July 5, 1985, letter. Frankly, I find it unfortunate that you felt compelled to interject into the record by copies of your correspondence to the Court matters not previously before the Court; but I assume that you merely failed to note that my letter to the FEC respecting the failure of the FEC to notify Mr. Schoener or myself of the contact with the Court through its representative, Ms. Covell, was not copied to the Court. I am sure that Judge Porter does not want four inches of letters in his file. Although I believe any response which clarified my correspondence to the Court concerning memorializing the matters contained therein would have been appropriate, I believe the addition of the ancillary matters is not appropriate. Hopefully, enough has been said on that point.

At this time, I would request your clarification as to who is acting as counsel for FEC on this matter. You are the third attorney for the FEC with whom I have had some form of communication. On previous occasions, when I have called for Ms. Reilly, Ms. Lerner always seems to need to be involved, which is fine with me. I have thus been proceeding on the basis that Ms. Reilly and Ms. Lerner are co-counsel on this case. Is that correct? Are you an additional attorney on the case? Please provide me the identities of the attorneys to whom I should send correspondence and copies of pleadings. Also, please advise whether my prior understanding that Ms. Reilly and Ms. Lerner are also counsel for the individual Commissioners is correct. If not, please advise the name(s) of any such attorney(s).

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Please note my advice in the separate enclosed correspondence dated July 9, 1985, copied to the Court, that Mr. Schoener and I inadvertently failed to properly communicate concerning the method of proceeding with discovery. I apologize for any confusion caused your Office in this respect. However, please be advised that appropriate response to the Request for Production of Documents as served on the FEC and the Commissioners is expected. In this regard, I call your attention to the provisions of Rule 2.1, Local Rules of Practice, United States District Court, Northern District of Texas, and Miscellaneous Order #29 relative thereto, respecting appropriate procedures for discovery. Copies are attached for your reference.

Finally, this is to request that copies of future correspondence and pleadings in this matter be provided to Edward J. Drake, Esq., in addition to Mr. Schoener and myself. Mr. Drake's address and telephone number are: Vineyard, Drake & Miller, 1820 Lincoln Plaza, 500 N. Akard, Dallas, Texas 75201, (214) 720-2222. You will note that Mr. Drake's name appears on our most recent pleadings.

Yours very truly,

MAXWELL, GODWIN & CARLTON

David N. Everett

DNE/aj
Enclosure

cc: Ms. Patty Reilly
Ms. Lois Lerner
Edward J. Drake, Esq.
John Baxter
James Schoener, Esq.

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Rule 1.4: Miscellaneous Order Files

The Clerk of the Court shall maintain in each Division of the Northern District of Texas a copy of all Miscellaneous Orders.

Rule 1.5: Repeal of Previously Existing Local Rules

All local rules or Miscellaneous Orders not filed in accordance with Local Rule 1.4, are hereby repealed.

Rule 1.6: Effective Date

These local rules shall take effect on March 1, 1978. They shall govern all proceedings in actions brought after that date and all further proceedings in actions then pending.

II. GENERAL FORM, FILING, AND SERVICE OF ALL PAPERS

Rule 2.1: General Form Filing, and Service of All Papers

(a) *"Legal Document," Defined.* The term "legal document" shall mean every pleading, petition, application, motion, brief, notice, demand, offer, request, proposed order, paper relating to discovery, or other paper to be made a part of the record in any civil or criminal proceeding.

(b) *Filing with the Clerk.* Every legal document shall be tendered for filing directly to the Clerk of the Court for the appropriate Division. The Clerk shall forward the legal document, or a copy thereof, to the Presiding Judge.

(c) *Filing in Duplicate.* An original and one copy of every legal document shall be tendered for filing to the Clerk. Only the original of depositions and exhibits thereto need be filed. [See Rule 6.1(a)].

(d) *Instruments Containing More Than One Legal Document.* Except for a proposed order (see Rule 5.5), a single instrument may contain more than one legal document, but any such instrument shall be entitled in such a manner as to identify each legal document included therein.

(e) *General Form of All Legal Documents.* In addition to the requirements of the Federal Rules of Civil and Criminal Procedure, every instrument containing a legal document shall:

(1) bear on its face the style of the case;

(2) bear on its face the complete docket number as designated by the Clerk of the Court;

(3) bear on its face a title, as required by section (d), designating and identifying each and every legal document or other important paper contained therein or affixed thereto; and

(4) contain a certificate, signed by the party or attorney, that service has been effected as required.

(f) *Certificate of Good Faith.* The provisions of Rule 11 of the Federal Rules of Civil Procedure will be strictly enforced. Rule 11 in part provides as follows:

> The signature of an attorney constitutes a certificate by him that he has read the pleading; that to the best of his knowledge, information, and belief there is good ground to support it; and that it is not interposed for delay. If a pleading is not signed or is signed with intent to defeat the purpose of this rule, it may be stricken as sham and false and the action may proceed as though the pleading had not been served. For a wilful violation of this rule an attorney may be subjected to appropriate disciplinary action. Similar action may be taken if scandalous or indecent matter is inserted.

(See also 28 U.S.C., Section 1927).

III. COMMENCEMENT OF ACTIONS

Rule 3.1: Filing and Service of Original Civil Complaints

(a) *Required Forms and Fees.* In the complaint the title of the action shall include the names of all the parties, but in other pleadings it is sufficient to state the names of the first party on each side with an appropriate indication of other parties. See Rule 10 F.R.C.P. In addition to the requirements of Local Rule 2.1, when an original civil complaint is tendered for filing, plaintiff shall provide the Clerk of the Court with the following:

(1) sufficient copies of the original complaint for service on each defendant;

(2) a completed Civil Summons Form (as supplied by the Clerk) for each defendant to be served with process;

(3) a completed Marshal's Service Form (as supplied

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

AMENDMENT TO LOCAL RULES

MISCELLANEOUS ORDER #29

Rules 2.1(b) and (c) and Rule 2.2 of the Local Rules of Practice for the United States District Court for the Northern District of Texas are amended to read as follows:

Rule 2.1: General Form Filing and Service of All Papers

. . .

(b) Filing with the Clerk. Every legal document except discovery materials (see Rule 2.2) shall be tendered for filing directly to the Clerk of the Court for the appropriate Division. The Clerk shall forward the legal document, or a copy thereof, to the Presiding Judge.

(c) Filing in Duplicate. An original and one copy of every legal document except discovery material (see Rule 2.2) shall be tendered for filing to the Clerk.

. . .

Rule 2.2: Filing of Discovery Materials

Due to the considerable cost to the parties of furnishing discovery materials, and the serious problems encountered with storage, the following procedure shall apply to the filing of discovery materials:

(a) Interrogatories under Rule 33, Federal Rules of Civil Procedure, and the answers thereto, Requests for Production or Inspection under Rule 34, Federal Rules of Civil Procedure, Requests for Admissions

Rule 6.1: Discovery Documents, Generally

Except as provided herein, discovery material required to be filed pursuant to Local Rule 2.2 must meet all the requirements of Local Rule 2.1, except that only the original copy of a deposition and the exhibits need be filed. All discovery motions must comply with Local Rule 5.1.

(a) Depositions shall not be filed with the Clerk. The original of any transcript of an oral deposition and the attached exhibits:

(1) shall be delivered to the party taking the deposition upon signature by the deponent; or upon completion, if signature is waived on the record by the deponent and all interested parties; or upon certification by the reporter that, following reasonable notice to the deponent and deponent's attorney (if any) of the availability of the transcript for signature, the deponent has failed or refused to sign it;

(2) shall be retained by the party to whom it is delivered to be available for appropriate use by any party in a hearing or trail of the case; and

(3) shall be filed with the Clerk at least three (3) days before commencement of trial, or as otherwise ordered by the Presiding Judge, if any portion of the deposition is reasonably expected to be used at trial.

These amendments to the Local Rules shall be effective the 31st day of March, 1983.

HALBERT O. WOODWARD
Chief United States
District Judge

United States District Judges:

Robert M. Hill	Mary Lou Robinson
Eldon B. Mahon	Jerry Buchmeyer
Robert W. Porter	A. Joe Fish
Barefoot Sanders	David O. Belew, Jr.

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85 JUL 15 A8:55

MAXWELL, GODWIN & CARLTON
ATTORNEYS AND COUNSELORS
A PROFESSIONAL CORPORATION
1200 DIAMOND SHAMROCK TOWER
717 NORTH HARWOOD STREET
DALLAS, TEXAS 75201

DAVID N EVERETT

TELEPHONE: 214 742-4422
TELECOPIER: 214 760-7332
TELEX: 709816 MG+C UD
D/FW METRO: 263-1186

July 9, 1985

Ivan Rivera, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: Friends of Phil Gramm, et al., v.
Federal Election Commission, et al.,
In the United States District Court
for the Northern District of Texas
at Dallas, Cause No. CA3-85-1164-F,
The Honorable Robert W. Porter, Judge.

RE: MUR 1837-The Friends of Phil Gramm and
John Baxter, as Treasurer

Dear Mr. Rivera:

This will acknowledge receipt on July 8, 1985, of your letter dated July 5, 1985, with copies to Judge Porter and Ms. Covell.

Although I do not wish to clutter the record with cross correspondence, my previous correspondence to Ms. Reilly and Ms. Lerner, copied for the Court, was for the purpose stated therein, to-wit: to preserve for our record what was discussed during the referenced telephone conversation in the absence of any orders. If I inadvertently misstated the substance of that conversation, I will stand corrected. Otherwise, I am not aware of any mischaracterizations contained in that memorization and do not note any in your July 5, 1985, correspondence other than your obvious disagreement with our contention that your intended litigation should be considered substantively a compulsory counter-claim. That issue, of course, will be resolved by the Court through appropriate subsequent pleadings and rulings.

Concerning the expressed bewilderment of your office relative to the point I had raised in previous correspondence, not copied to the Court, requesting that I be contacted concerning contacts with the Court or its representatives, I would note the following:

1. That point was raised in correspondence directed to the FEC only, with no copies to the Court. Since you have now raised the matter in the Court file through your copies of your July 5, 1985, letter, I am herewith enclosing a copy of my previous correspondence for the benefit of the Court;

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2. I am sure the Court does not want the record in this case cluttered with cross correspondence of counsel, and that is why I wrote you about those issues directly. In the future, I would suggest we communicate directly about such matters, but at this juncture, I do want the record clear since you have interjected the point;

3. If you will please review my previous correspondence, my expressed concern was not the fact of the contact with the Court. As you noted, Judge Porter had requested to be advised of the FEC's decision, and I am sure Ms. Covell had some related inquiries. However, as a participant in the June 21, 1985, conference call hearing conducted for the convenience of the FEC as well as the Court, I distinctly recall Judge Porter requesting that the FEC attorneys advise the Court and counsel of the decision of the FEC in respect to the questions raised during the hearing. I do not recall that you were a participant in that telephone conference hearing;

4. As previously noted in earlier correspondence, neither Mr. Schoener nor I were advised of the FEC's decision until we generated a call to the FEC, and it was at that time we learned of the communications with the Court. As co-counsel for Friends of Phil Gramm, there were questions raised in my mind concerning the exact posture of our proceedings based on the decision of the FEC, which I am satisfied were addressed during our subsequent telephone conference call with Ms. Covell. Your response in your July 5, 1985, letter leads me to believe that you missed the point entirely, which is that conference with opposing counsel on matters to be addressed to the Court or its representatives will enable all counsel to assure that their positions or questions are addressed to the Court or its representatives in a proper fashion and not on a piece-meal basis. My expressed reservations, again, were not derived on the basis that the FEC advised the Court and discussed the matter; rather, my reservations were that opposing counsel were not consulted or advised and permitted to address the points of interest to opposing counsel until opposing counsel were required to contact the FEC; and, when the FEC's representatives were unable to address the questions raised by counsel for Friends of Phil Gramm, a subsequent telephone conference call was necessitated.

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Finally, respecting the expressed puzzlement of your office regarding discovery heretofore discussed, please accept our apologies for any confusion which may have arisen from the submission by Mr. Schoener of the Request for Production of Documents concurrent with my correspondence requesting the advice of the FEC as to whether informal discovery could be pursued. Mr. Schoener and I obviously miscommunicated on that point. However, please consider the discovery pleadings served on you by Mr. Schoener to be in full force and effect and respond pursuant to the Rules.

It is not my practice, and I am sure not the preference of the Court to say the least, that counsel engage in "correspondence pleading", and I would suggest that heretofore all counsel communicate directly on matters not specifically involving the Court. I did feel that it was important to have memorialized for the record the basic substance and context of the June 21, 1985, telephone conference hearing and the resolution of that hearing pursuant to the Court's request. I believe these other matters have been unnecessarily interjected into the record at this point and would hope that on these, and other similar matters not directly involving the Court, we will be able to address such matters directly among ourselves until such point as the Court's involvement should become necessary.

Yours very truly,

MAXWELL, GODWIN & CARLTON

David N. Everett

DNE/aj

cc: The Honorable Robert F. Porter
Rebecca Covell, Esq.
James F. Schoener, Esq.
John Baxter
Edward J. Drake, Esq.
Patty Reilly, Esq.
Lois Lerner, Esq.

8904074409

June 27, 1985

FEDERAL EXPRESS

Ms. Lois Lerner, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Ms. Patty Reilly, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Friends of Phil Gramm, et al., v.
Federal Election Commission, et al.,
In the United States District Court
For the Northern District Texas at Dallas,
CA3-85-1164-P, Honorable Robert W. Porter, Judge

Dear Ms. Lerner and Ms. Reilly:

Please have reference to my letter to you of June 27, 1985 with copy to the Court.

With the matters noted in that letter in mind, with Friends of Phil Gramm, et al., hereby request that you engage in discussions concerning expedited discovery whereby we will be able to informally develop necessary facts to permit as expedited a hearing date as possible, since that is something you have expressed that you desire. Although your answer to the complaint is not due until 60 days from the date of service on you - and without waiving the contention of Friends of Phil Gramm, et al., that any suit for enforcement of the subpoena is in fact a compulsory counterclaim to that suit - you are hereby requested to advise as to whether (a) you will receive interrogatories and requests for production of documents prior to your answer date, and (b) whether you will produce witnesses, particularly members of the commission, within an expedited time-frame after response

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to any interrogatories but sufficiently in advance of any anticipated hearing date so that Friends of Phil Gramm will be able to adequately prepare for any anticipated hearing. Please consult with your client and advise at your earliest opportunity of your intentions in these respects.

Finally, although somewhat of a minor point, I would request that in the future if there is going to be any communication with the Court or its representatives, especially in an instance such as this where the Court has requested that the Court and counsel be advised of certain matters, you extend the courtesy of attempting to include counsel for Friends of Phil Gramm in any such communications prior to and during their occurence; or, in the event of exigent circumstances which inextricably prevent that, that you promptly notify counsel for Friends of Phil Gramm as soon as possible after any such communication has occurred. In this instance, although I understand a letter was delivered to Mr. Schoener on the afternoon of June 26, 1985 advising that the FEC was going to proceed with an enforcement action of the subpoena, this did not really address all of the issues that had been raised in the conference telephone hearing of June 21, 1985. Furtheraore, your correspondence did not reflect that you had communicated with a respresentative of the Court, and only after our initiating a call to you at approximately 3:45 p.m. EDT did we discover that there had been a telephone discussion between yourself and a representative of the Court on the morning of June 26, 1985. Although I am not suggesting ill motive on your part I trust that you can appreciate the purpose of providing notice to all counsel of communications with the Court is intended so that that questions of all counsel, be they relevant or irrelevant in the minds of others, can be addressed and all counsel adequately apprised. We have attempted to proceed in that spirit to date and would respectfully request your reciprocation in this regard.

I await your reponse to the request set forth herein.

Yours very truly,

MAXWELL, GODWIN & CARLTON

David N. Everett

cc: Mr. John Baxter
Mr. Edward J. Drake, Esq.
Mr. James F. Schoener, Esq.

8204074411

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1985

M. N. Bostick
c/o KWTX Broadcasting Company
4520 Bosque Boulevard
Waco, Texas 76710

RE: MUR 1837
M. N. Bostick

Dear Mr. Bostick:

On July 10, 1985, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

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

9904074401 2

RECEIVED AT THE FEC

85 JUN 20 A9:15

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
M.N. Bostick	)	MUR 1837
	)	

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Donna Mobley. The Commission found reason to believe that M.N. Bostick ("Respondent") violated 2 U.S.C. § 441f by using his name to effectuate the contribution of another, and aninvestigation was conducted.

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

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

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

1. Respondent, M.N. Bostick, is a resident of Texas and president of KWTX Broadcasting Company, a Texas Corporation, ("the Corporation").

2. Respondent purchased 10 tickets for a total of $1,250 for a fundraising given by the Friends of Phil Gramm on October 10, 1984.

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3. Respondent subsequently received on November 20, 1984, $1,250 from the Corporation as a payment for his contributions.

4. After notification from the Commission of reason to believe that the Act had been violated, Respondent returned this money to the Corporation on April 10, 1985.

V. Respondent permitted KWTX Broadcasting Company to use his name to effect a contribution made by the corporation, in violation of 2 U.S.C. § 441f.

VI. 1. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Two hundred dollars ($200) pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondent will furnish the Commission with a copy (front and back) of his cancelled check for $1,250 paid to the Friends of Phil Gramm for fund-raising tickets.

3. Respondent will furnish the Commission with a copy (front and back) of the cancelled check for $1,250 received by him from the KWTX Broadcasting Company as a reimbursement for his contributions to the Friends of Phil Gramm.

4. Respondent will furnish the Commission with a copy (front and back) of his check for $1,250 returning the reimbursement of KWTX as noted above.

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

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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 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 Date
Associate General Counsel

FOR THE RESPONDENTS:

_____ _____
M.N. Bostick Date

8204074401 5

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE SECRETARY
FEC

In the Matter of)
)
KWTX Broadcasting Company, Inc.) MUR 1837

05 JUL 5 P3:23

GENERAL COUNSEL'S REPORT

SENSITIVE

Background

Attached is a conciliation agreement signed by Mr. M. N. Bostick, as president of KWTX Broadcasting Company ("the Corporation").

39044016

Recommendation

The Office of the General Counsel recommends that the Commission accept this agreement, approve the attached letter, and close the file regarding this respondent.

Charles N. Steele
General Counsel

July 2, 1985
Date

Kenneth A. Gross (RHT)
Kenneth A. Gross
Associate General Counsel

Attachments

I. Conciliation Agreement
II. Copies of cancelled checks
III. Copy of civil penalty check
IV. Letter to Respondent

8904007440017

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1837
KWTX Broadcasting Company, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 10, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1837:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed July 2, 1985.
2. Approve the letter attached to the General Counsel's Report signed July 2, 1985.
3. Close the file regarding this respondent.

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

Attest:

7-10-85
Date

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 7-5-85, 3:23
Circulated on 48 hour tally basis: 7-8-85, 11:00

9204074018

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1985

KWTX Broadcasting Company
M. N. Bostick, President
4520 Bosque Boulevard
Waco, Texas 76710

RE: MUR 1837
KWTX Broadcasting Co., Inc.

Dear Mr. Bostick:

On July 10, 1985, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. §§ 441b and 441f, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

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

8204074419

RECEIVED BY THE FEC

85 JUN 20 A9:15

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
KWTX Broadcasting Corporation	)	MUR 1837
	)	

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Donna Mobley. The Commission found reason to believe that KWTX Broadcasting Corporation ("Respondent") violated 2 U.S.C. §§ 441b and 441f by making a corporate contribution and by making a contribution in the name of another. Accordingly, an investigation was conducted.

NOW, THEREFORE, the Commission and Respondent, 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 Respondent, 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. Respondent have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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

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

1. Respondent, KWTX Broadcasting Company, Inc., is a Texas Corporation.

2. Respondent gave $1250 to its president and general manager, Mr. M.N. Bostick on November 20, 1984.

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3. Mr. Bostick used these corporate funds as a reimbursement for 10 tickets he purchased for a fundraising event held by the Friends of Phil Gramm on October 10, 1984.

4. Respondent did not identify itself as the source of this contribution. The name of M.N. Bostick was used to effectuate this contribution.

5. When notified by the Commission of the impermissability of this contribution, the amount of the contribution was returned to Respondent on April 10, 1985.

V. 1. Respondent made a contribution of $1250 to a federal electon from its general funds in violation of 2 U.S.C. § 441b.

2. Respondent made a contribution using the name of M.N. Bostick in violation of 2 U.S.C. § 441f.

VI. 1. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two hundred dollars ($200) pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondent will furnish the Commission with a copy of his cancelled check (front and back) evidencing its advancement of $1,250 to M.N. Bostick.

3. Respondent will furnish the Commission with a copy of the cancelled check (front and back) evidencing Mr. M.N. Bostick's repayment of $1250 to the Corporation.

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

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

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

July 18, 1985
Date

FOR THE RESPONDENT:

M.N. Bostick
M.N. Bostick
President, KWTX Broadcasting

17 June 1985
Date

8204074402 2

GCC# 8274
RECEIVED BY THE FEC

MAXWELL, GODWIN & CARLTON

85 AUG 12 A10:31

ATTORNEYS AND COUNSELORS

A Professional Corporation

3300 InterFirst Plaza
901 Main Street
Dallas, Texas 75202

Telephone: 214 742-4422
D/FW Metro. 263-1186
Telex. 709618
Telecopier: 214 760-7332

DAVID N. EVERETT

August 6, 1985

AUG 12 A11:49

Lois Lerner, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: Friends of Phil Gramm, et al., v.
Federal Election Commission, et al.,
In the United States District Court
for the Northern District of Texas
at Dallas, Cause No. CA3-85-1164-F,
The Honorable Robert W. Porter, Judge.

RE: MUR 1837-The Friends of Phil Gramm and
John Baxter, as Treasurer

Dear Ms. Lerner:

This will acknowledge receipt on August 5, 1985 of your letter to Mr. Schoener dated July 31, 1985, with copy to me memoralizing our conference telephone conversation of July 31.

Concerning your concluding observation that despite your advice to the effect that your motion would be legal, rather than factual, and that Friends of Phil Gramm nonetheless opposed your motion, please let this confirm and memoralize that the Friends of Phil Gramm declined to agree to an abatement of discovery pending determination by the Court of your motions countenanced to be legal in nature only after our discussions concerning the fact that the Friends of Phil Gramm did not intend and would not waive its right to discover all relevant information bearing on the contentions of Friends of Phil Gramm that the FEC has acted in an arbitrary and capricious manner violative of the constitutional rights of Friends of Phil Gramm, as well as having acted outside the legislative enabling parameters conferred on the FEC by Congress, and your advice of the position of the FEC that if the action maintained by Friends of Phil Gramm is dismissed, such discovery would be resisted in the subpoena enforcement action which the FEC has previously stated is going to be filed.

It was only under these circumstances that Friends of Phil Gramm could not agree to an abatement of discovery, and I trust your notes of our conversation so reflect. If I have not correctly characterized the context of the declination for abatement, please advise me immediately.

Finally, as a housekeeping note, you will recall that I have requested in previous correspondence that copies of all correspondence and pleadings be provided to not only Mr. Schoener and myself, but also Mr. Edward J. Drake. Assuming that the latest correspondence was not transmitted to Mr. Drake by oversight, I would appreciate your attention to this matter in the future. If you have an objection to doing this, please notify me immediately.

Yours very truly,

MAXWELL, GODWIN & CARLTON

David N. Everett

DNE/aj

cc: John Baxter
James F. Schoener, Esq.
Edward J. Drake, Esq.
Patty Reilly, Esq.
Ivan Rivera, Esq.

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RECEIVED BY THE FEC
COM#9417
86 JAN 31 P12:30

LAW OFFICES
McGUINESS & WILLIAMS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N. W.
WASHINGTON, D. C. 20005

202 789-8600

JAMES F. SCHOENER
202 789-8644

86 JAN 31 P3:43

January 29, 1986

Patty Reilly, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: F.E.C. v. Friends of Phil Gramm, MUR 1837

Dear Ms. Reilly:

This letter is in response to your letter of January 24 regarding the matters between my clients, Friends of Phil Gramm and John Banter, treasurer. I will continue to represent the respondents in this MUR and the audit proceeding therefrom. The other counsel will no longer be involved.

Mr. Huckaby, as our accountant, as well as Mr. Davis, his assistant, are responsible to me as counsel to the Committee and other than the usual matters between accountants that Mr. Favin or Mr. Nurthern may have, I assume all correspondence and matters concerning the audit will be directed to me.

Very truly yours,

James F. Schoener

James F. Schoener

cc: David N. Everett
Edward Drake
John Banter
Stan Huckaby

9004074426

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	
The Friends of Phil Gramm and John Baxter, as treasurer	)	MUR 1837

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter arises from a complaint filed on October 31, 1984 by Ms. Donna Mobley of Austin, Texas against the Friends of Phil Gramm ("the Committee") and John Baxter, as treasurer, and 170 other persons. On March 5, 1985 the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), and 434(b)(3)(A), as well as 11 C.F.R. § 102.17. The Commission also authorized an audit of the Committee pursuant to 2 U.S.C. § 437g(a)(2).

Upon the Committee's refusal to permit this audit, on June 20, 1985, the Commission subpoenaed the Committee's books and records. Additionally, on this date the Committee filed suit in Dallas, Texas, seeking judical intervention into the Commission's decision to find reason to believe the respondents had violated the Act. On June 24, 1985, the Commission denied respondents' motion to quash the subpoena and authorized the Office of the General Counsel to file suit in Texas for the enforcement of this subpoena.

At an October 7, 1985 show cause hearing, in Dallas, the court granted the Commission's motion to dismiss respondents' complaint. On October 31, 1985, a second show cause hearing was

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held on the relevancy of the Commission's subpoena. This hearing was suspended in order to permit discussions between the parties regarding the scope of the Commission's subpoena. A tentative agreement was reached and this Office wad directed by the court to write an order for the parties to stipulate.

Negotiations on this order reached an impasse. Thereafter, both this Office and respondents submitted proposed orders to the Court. On January 16, 1986, Judge Robert Porter signed the Commission's order with minor modifications. After further discussions with the Committee's staff, an audit date was set for February 18, 1986. The audit commenced on that date. Upon the completion of the audit and a review of the audit report, this Office will report to the Commission with appropriate recommendations.

8904074027

Charles N. Steele
General Counsel

March 3, 1986
Date

BY: _____
Kenneth A. Gross
Associate General Counsel

Attachments
1. Commission's Subpoena
2. Court Order

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

FEDERAL ELECTION COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	NO. CA3-85-1507-F
	)	
FRIENDS OF PHIL GRAMM, and JOHN BAXTER, as treasurer,	)	
	)	
Respondents.	)	

ORDER AUTHORIZING ENFORCEMENT OF SUBPOENA

This matter having come before the Court for evidentiary hearing on October 31, 1985, pursuant to an order of this Court requiring the Friends of Phil Gramm and John Baxter, as treasurer, ("FPG") to show cause why the petition of the Federal Election Commission ("FEC") filed August 5, 1985, for enforcement of a Subpoena Duces Tecum issued June 20, 1985, pursuant to the provisions of 2 U.S.C. §§ 437d(a)(3) and 437g(a)(2) should not be granted, and as to which FPG filed objections of record; the Court having heard partial testimony and having advised counsel for the parties of the potential for compromise resolution of the disputes herein; counsel for the respective parties, together with their respective accounting experts, having conferred in the presence of the Court's representative regarding the bases for entry of an Agreed Order; and each of the parties, by counsel, having announced in open Court the nature and terms of the proposed agreement; and the Court being otherwise sufficiently advised,

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ATTACHMENT #1

IT IS HEREBY ORDERED AND ADJUDGED that the Petition of the FEC for enforcement of the subpoena issued June 20, 1985, is hereby granted subject to the following:

1. Numerical paragraph 1 of the Definitions in the subpoena shall be construed to mean documents and records customarily maintained for FEC compliance purposes, and shall include a 'hard copy' computer print-out, in alphabetical order, of all information stored in the FPG computer system listing all contributors and information relative thereto for FEC compliance purposes as to each;

2. Numerical paragraph 1 of the Definitions to the subpoena also shall be deemed to include access to any and all supporting documentation reviewed or utilized by Political Financial Services, the accounting firm of Mr. Stan Huckaby, during the course of its review of FPG's campaign financial records and which said documents also constitute in part, but not with limitation, the supporting documentation for the amended reports of FPG filed with the FEC;

3. The first paragraph numbered 3 within the list of subpoenaed materials set forth in the subpoena shall be construed to mean representative samples of all FPG solicitation materials, including but not limited to brochures, flyers, letters and handouts, and shall not mean all of such documents generated by FPG.

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4. The temporal scope of the second paragraph numbered 3 within the list of subpoenaed materials set forth in the subpoena shall begin February 12, 1983, rather than July 1983;

5. The temporal scope of paragraph 8 shall be February 12, 1983, and thereafter;

6. Subject to the foregoing, FPG has agreed to produce, within the parameters of this Order, the documents requested in numerical paragraphs 1, 3, 4, 5, 7 and 8. Although otherwise agreeing to provide the documents described in paragraphs 2 and 6 of the list of subpoenaed materials set forth in the subpoena, FPG has advised the Court that such documents do not exist, but will be provided if discovered.

7. The parties agree to make good faith efforts to resolve among themselves any other matters that may arise regarding compliance with this subpoena.

DATED this ___ day of December, 1985.

HONORABLE ROBERT W. PORTER,
UNITED STATES DISTRICT JUDGE

8204074030

8 JAN 21 A10:2

U. S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
JAN 16 1986
NANCY HALL DOHERTY, CLERK
By ppl Deputy

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF TEXAS

DALLAS DIVISION

FEDERAL ELECTION COMMISSION)
vs) NO.CA3-85-1507-F
FRIENDS OF PHIL GRAMM, etal)

JAN 21 P1:34

ORDER

Came on to be considered respondents' motion for entry of tendered order and objections to the order tendered by the FEC. Having reviewed the proposed orders and the transcript, the Court will deny the motion. With minor modifications, the Court will enter this date the order tendered by the FEC. Accordingly, it is hereby

ORDERED that respondents' motion for entry of tendered order and objections are DENIED.

Signed and entered this 16th day of January, 1986.

ROBERT W. PORTER
UNITED STATES DISTRICT JUDGE

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ATTACHMENT #2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U. S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
JAN 16 1986
NANCY HALL DOHERTY, CLERK
By _____ Deputy

FEDERAL ELECTION COMMISSION,

Petitioner,

v.

FRIENDS OF PHIL GRAMM, and JOHN BAXTER, as treasurer,

Respondents.

NO. CA3-85-1507-F

ORDER AUTHORIZING ENFORCEMENT OF SUBPOENA

This matter having come before the Court for evidentiary hearing on October 31, 1985, pursuant to an order of this Court requiring the Friends of Phil Gramm and John Baxter, as treasurer, ("FPG") to show cause why the petition of the Federal Election Commission ("FEC") filed August 5, 1985, for enforcement of a Subpoena Duces Tecum issued June 20, 1985, pursuant to the provisions of 2 U.S.C. §§ 437d(a)(3) and 437g(a)(2) should not be granted, and as to which FPG filed objections of record; the Court having heard partial testimony and having advised counsel for the parties of the potential for compromise resolution of the disputes herein; counsel for the respective parties, together with their respective accounting experts, having conferred in the presence of the Court's representative regarding the bases for entry of an Agreed Order; and each of the parties, by counsel, having announced in open Court the nature and terms of the proposed agreement; and the Court being otherwise sufficiently advised,

9204074403 2

IT IS HEREBY ORDERED AND ADJUDGED that the Petition of the FEC for enforcement of the subpoena issued June 20, 1985, is hereby granted subject to the following:

1. Numerical paragraph 1 of the Definitions in the subpoena shall be construed to mean documents and records customarily maintained for FEC compliance purposes, and shall include a 'hard copy' computer print-out, in alphabetical order, of all information stored in the FPG computer system listing all contributors and information relative thereto for FEC compliance purposes as to each;

2. Numerical paragraph 1 of the Definitions to the subpoena also shall be deemed to include access to any and all supporting documentation reviewed or utilized by Political Financial Services, the accounting firm of Mr. Stan Huckaby, during the course of its review of FPG's campaign financial records and which said documents also constitute in part, but not with limitation, the supporting documentation for the amended reports of FPG filed with the FEC;

3. The first paragraph numbered 3 within the list of subpoenaed materials set forth in the subpoena shall be construed to mean representative samples of all FPG solicitation materials, including but not limited to brochures, flyers, letters and handouts, and shall not mean all of such documents generated by FPG.

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4. The temporal scope of the second paragraph numbered 3 within the list of subpoenaed materials set forth in the subpoena shall begin February 12, 1983, rather than July, 1983;

5. The temporal scope of paragraph 8 shall be February 12, 1983 and thereafter;

6. Subject to the foregoing, FPG has agreed to produce, within the parameters of this Order, the documents requested in numerical paragraphs 1, 3, 4, 5, 7 and 8. Although otherwise agreeing to provide the documents described in paragraphs 2 and 6 of the list of subpoenaed materials set forth in the subpoena, FPG has advised the Court that such documents do not exist, but will be provided if discovered.

7. The parties shall make a good faith effort to resolve among themselves any other matters that may arise regarding compliance with this subpoena.

8. Enforcement having been granted, as limited herein, this case is CLOSED.

Signed and entered this 16th day of January, 1986

ROBERT W. PORTER
UNITED STATES DISTRICT JUDGE

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MUR 1837 - File

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 13, 1986

Mr. James F. Schoener
McGuiness & Williams
1015 Fifteenth Street, NW
Washington, D.C. 20005

Dear Mr. Schoener:

The purpose of this letter is to reduce to writing the requests made by Rick Halter and Marty Favin of the Audit Division on March 12, 1986 in separate telephone conversations with you in your capacity as Counsel to Friends of Phil Gramm.

The Audit Division wishes to change the site of the court-ordered audit of the Friends of Phil Gramm from the Quality Inn in Dallas, Texas, to the Federal Election Commission in Washington, D.C. Accordingly, we are requesting removal of the materials listed in the court's order to the Commission's offices. The purpose of this relocation is to conclude the fieldwork in the most efficient manner.

The records will be shipped at Commission expense (both ways) via United Parcel Service including insurance for a reasonable amount. The Audit Division's review of these records should be completed within three weeks of our receipt (not including delivery time of 5 business days each way). Finishing the audit fieldwork in Washington, D.C. will permit the Commission to devote greater staff resources to this project, and thus ensure the completion of the audit more expeditiously. Upon completion of our review, the records will be shipped back to a location of your choice in Dallas. We expect the records to be returned no later than Friday, April 18, 1986, assuming the carrier picks up the records on March 14, 1986.

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It is my opinion that completion of the audit fieldwork in Washington, D.C. will be beneficial to all parties concerned. Because of the need to make necessary shipping arrangements and the mounting expenses of maintaining the audit site in Dallas, we ask that you respond to this request by the close of business today, March 13, 1986. It is my hope that we may resolve this matter without resort to further legal action.

Should you have any questions, please contact Rick Halter or Tom Nurthen at (202) 376-5320.

Sincerely,

Robert J. Costa
Assistant Staff Director
for the Audit Division

cc: Mr. John P. Baxter
Treasurer

Mr. Stan Huckaby

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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EXECUTIVE SESSION

'86 MAR 28 AM : 23

APR 1 1986

March 28, 1986

Submitted Late

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

SUBJECT: Late Submission to the Commission Agenda of April 1, 1986; MUR 1837

The Office of the General Counsel requests that the attached report be added to the Commission's April 1, 1986 agenda as a late submission.

Attachment

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Friends of Phil Gramm and John Baxter, as treasurer	)	MUR 1837
	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter arises from a complaint filed on October 31, 1984, by Ms. Donna Mobley of Austin, Texas, against The Friends of Phil Gramm ("the Committee") and John Baxter, as treasurer, and 170 other persons. On March 5, 1985, the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), and 434(b)(3)(A), as well as 11 C.F.R. § 102.17. The Commission also authorized an audit of the Committee pursuant to 2 U.S.C. § 437g(a)(2).

Upon the Committee's refusal to permit this audit, on June 20, 1985, the Commission subpoenaed the Committee's books and records. Additionally, on this date the Committee filed suit in Dallas, Texas, seeking judicial intervention into the Commission's decision to find reason to believe the respondents had violated the Act. On June 24, 1985, the Commission denied respondents' motion to quash the subpoena and authorized the Office of the General Counsel to file suit in Texas for the enforcement of this subpoena.

At an October 7, 1985, show cause hearing, in Dallas, the court granted the Commission's motion to dismiss respondents' complaint. On October 31, 1985, a second show cause hearing was

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held on the relevancy of the Commission's subpoena. This hearing was suspended in order to permit discussions between the parties regarding the scope of the Commission's subpoena. A tentative agreement was reached and this Office was directed by the court to write an order for the parties to stipulate to.

Negotiations on this order reached an impasse. Thereafter, both this Office and respondents submitted proposed orders to the court. On January 16, 1986, Judge Robert Porter signed the Commission's order with minor modifications. Following further discussions with the Committee's staff, the audit commenced on February 19, 1986.

II. RELOCATION OF THE AUDIT SITE TO WASHINGTON

On March 12, 1986, after discussing the matter with this Office, the Audit staff contacted counsel for the respondents to obtain permission to move the Committee's records to Washington for completion of the audit. (Attachment I) Upon counsel's refusal */, the auditors returned to Washington and met with OGC staff to discuss what they had found and what further work was needed. As a result, the auditors were able to project the amount of time needed to complete the audit. If completed in Texas, the auditors anticipate a range of five to eight weeks

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*/ This Office also has spoken to counsel concerning this matter to no avail.

with four auditors working on the task. If the records can be brought here, the auditors feel this figure can be cut by one-third to one-half because more personnel can be committed to the work.

Because of the limited resources available to complete the audit in Texas, the Audit Division has asked this Office for assistance in getting the records moved to Washington. (Attachment II) Under the circumstances, the General Counsel's Office believes the best way to accomplish this is to file a motion with the court that ordered the audit, seeking modification of the Commission's subpoena to move the site of the audit to Washington.

For the following reasons, this Office feels the court will be receptive to a motion to modify the pending subpoena. First, the order issued by the court in the original subpoena action stated that the parties would make good faith efforts to resolve among themselves any further problems with the subpoena. (Attachment III) The Audit staff and this Office have tried to do so on several occasions and have documentation to back that claim. Second, removal of the records to Washington creates no burden or hardship to the Committee. As stated in Audit's letter to counsel, the Commission will bear the expense of moving the records and of insuring them. Furthermore, as the records are not presently available for the Committee's use (the audit site is a hotel room), the removal to Washington would cause little

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change. Because the Committee's accountants are in Washington, it will no longer be necessary for the Committee to pay for an accounting representative to be present in Texas. In addition, having the records in Washington will enable the auditors to complete the audit faster. As the Committee has been urging expedicious completion of the audit, this would be in its best interest. Finally, under these circumstances, the court is likely to be sympathetic to our budgetary problems.

Consequently, this Office seeks the Commission's authorization to file the appropriate motion to modify the subpoena.

III. RECOMMENDATION

Authorize the Office of the General Counsel to file a motion in the United States District Court for the Northern District of Texas seeking modification of the subpoena issued to The Friends of Phil Gramm and John Baxter, as treasurer.

27 March 1986
Date

Charles N. Steele
General Counsel

Attachments
I. March 13, 1986 Letter to Counsel
II. Memo from Audit Division
III. Court's Order

9204074401

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 13, 1986

Mr. James F. Schoener
McGuiness & Williams
1015 Fifteenth Street, NW
Washington, D.C. 20005

Dear Mr. Schoener:

The purpose of this letter is to reduce to writing the requests made by Rick Halter and Marty Favin of the Audit Division on March 12, 1986 in separate telephone conversations with you in your capacity as Counsel to Friends of Phil Gramm.

The Audit Division wishes to change the site of the court-ordered audit of the Friends of Phil Gramm from the Quality Inn in Dallas, Texas, to the Federal Election Commission in Washington, D.C. Accordingly, we are requesting removal of the materials listed in the court's order to the Commission's offices. The purpose of this relocation is to conclude the fieldwork in the most efficient manner.

The records will be shipped at Commission expense (both ways) via United Parcel Service including insurance for a reasonable amount. The Audit Division's review of these records should be completed within three weeks of our receipt (not including delivery time of 5 business days each way). Finishing the audit fieldwork in Washington, D.C. will permit the Commission to devote greater staff resources to this project, and thus ensure the completion of the audit more expeditiously. Upon completion of our review, the records will be shipped back to a location of your choice in Dallas. We expect the records to be returned no later than Friday, April 18, 1986, assuming the carrier picks up the records on March 14, 1986.

Attachment I

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It is my opinion that completion of the audit fieldwork in Washington, D.C. will be beneficial to all parties concerned. Because of the need to make necessary shipping arrangements and the mounting expenses of maintaining the audit site in Dallas, we ask that you respond to this request by the close of business today, March 13, 1986. It is my hope that we may resolve this matter without resort to further legal action.

Should you have any questions, please contact Rick Halter or Tom Nurthen at (202) 376-5320.

Sincerely,

Robert J. Costa
Assistant Staff Director
for the Audit Division

cc: Mr. John P. Baxter
Treasurer

Mr. Stan Huckaby

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AR-86-14

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 26, 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: AUDIT OF FRIENDS OF PHIL GRAMM

In order to complete the audit of the above named Committee in the manner agreed to by your staff, it is requested that the Office of General Counsel take the necessary action which provides for the Committee's records to be moved to our office. Relocation of the records from Dallas, Texas to Washington, D.C. will enable the Audit staff to devote greater staff resources to this audit, and thus ensure its completion more expeditiously.

Requests for the relocation of the records were made to the Committee's Counsel on March 12, 1986 by telephone and on March 13, 1986 in writing (see attached letter). However, such requests were denied.

As your staff is aware, the Audit Division is incurring expenses of $50.00 per day (since 3/14/86) for storage of the Committee's financial records needed to complete the audit; rather then returning the records to the Committee which your staff advised against doing. Expenses incurred to date total $650.00. A resolution of the issue involving proposed relocation or a determination to return the records to the Committee is necessary in the near future to alleviate the drain on very limited Audit Division travel funds.

Should you have any questions, please contact Marty Favin or Tom Nurthen at 376-5320.

Attachment as stated

Attachment II

9204074404

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

FEDERAL ELECTION COMMISSION,	)	
	)	
Petitioner,	)	
	)	
v.	)	NO. CA3-85-1507-F
	)	
FRIENDS OF PHIL GRAMM, and JOHN BAXTER, as treasurer,	)	
	)	
Respondents.	)	

ORDER AUTHORIZING ENFORCEMENT OF SUBPOENA

This matter having come before the Court for evidentiary hearing on October 31, 1985, pursuant to an order of this Court requiring the Friends of Phil Gramm and John Baxter, as treasurer, ("FPG") to show cause why the petition of the Federal Election Commission ("FEC") filed August 5, 1985, for enforcement of a Subpoena Duces Tecum issued June 20, 1985, pursuant to the provisions of 2 U.S.C. §§ 437d(a)(3) and 437g(a)(2) should not be granted, and as to which FPG filed objections of record; the Court having heard partial testimony and having advised counsel for the parties of the potential for compromise resolution of the disputes herein; counsel for the respective parties, together with their respective accounting experts, having conferred in the presence of the Court's representative regarding the bases for entry of an Agreed Order; and each of the parties, by counsel, having announced in open Court the nature and terms of the proposed agreement; and the Court being otherwise sufficiently advised,

Attachment III
(1063)

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IT IS HEREBY ORDERED AND ADJUDGED that the Petition of the FEC for enforcement of the subpoena issued June 20, 1985, is hereby granted subject to the following:

1. Numerical paragraph 1 of the Definitions in the subpoena shall be construed to mean documents and records customarily maintained for FEC compliance purposes, and shall include a 'hard copy' computer print-out, in alphabetical order, of all information stored in the FPG computer system listing all contributors and information relative thereto for FEC compliance purposes as to each;

2. Numerical paragraph 1 of the Definitions to the subpoena also shall be deemed to include access to any and all supporting documentation reviewed or utilized by Political Financial Services, the accounting firm of Mr. Stan Huckaby, during the course of its review of FPG's campaign financial records and which said documents also constitute in part, but not with limitation, the supporting documentation for the amended reports of FPG filed with the FEC;

3. The first paragraph numbered 3 within the list of subpoenaed materials set forth in the subpoena shall be construed to mean representative samples of all FPG solicitation materials, including but not limited to brochures, flyers, letters and handouts, and shall not mean all of such documents generated by FPG.

Attachment III
(2063)

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4. The temporal scope of the second paragraph numbered 3 within the list of subpoenaed materials set forth in the subpoena shall begin February 12, 1983, rather than July, 1983;

5. The temporal scope of paragraph 8 shall be February 12, 1983 and thereafter;

6. Subject to the foregoing, FPG has agreed to produce, within the parameters of this Order, the documents requested in numerical paragraphs 1, 3, 4, 5, 7 and 8. Although otherwise agreeing to provide the documents described in paragraphs 2 and 6 of the list of subpoenaed materials set forth in the subpoena, FPG has advised the Court that such documents do not exist, but will be provided if discovered.

7. The parties shall make a good faith effort to resolve among themselves any other matters that may arise regarding compliance with this subpoena.

8. Enforcement having been granted, as limited herein, this case is CLOSED.

Signed and entered this 16th day of January, 1986

ROBERT W. PORTER
UNITED STATES DISTRICT JUDGE

Attachment III
(3 of 3)

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1837
The Friends of Phil Gramm and)
John Baxter, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 1, 1986, do hereby certify that the Commission decided by a vote of 6-0 to authorize the Office of the General Counsel to file a motion in the United States District Court for the Northern District of Texas seeking modification of the subpoena issued to the Friends of Phil Gramm and John Baxter, as treasurer.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald, and McGarry voted affirmatively for the decision.

Attest:

4-2-86
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 9, 1986

HAND DELIVERED

James Schoener, Esquire
McGuiness & Williams
1015 15th Street, N.W.
Washington, N.W. 20005

Re: MUR 1837
Friends of Phil Gramm and
John Baxter, as treasurer

Dear Mr. Schoener:

This is to confirm your April 8, 1986 conversation with Lois Lerner of this Office regarding relocation of Friends of Phil Gramm's records to Washington, D.C. pending completion of the Commission's audit of the committee. During that conversation, Ms. Lerner explained that because of current budgetary constraints, the Commission has decided to conduct the remainder of the audit in Washington, D.C. Consequently, Ms. Lerner reiterated the Commission's request that you agree to removal of the subpoenaed documents to Washington, D.C.

In response, you indicated you were unwilling to agree to this move unless the Commission meets certain conditions, among them: holding an exit conference, paying all moving and insurance costs, providing a full inventory of all documents moved and agreeing that the Commission will take no further action regarding all violations involving lost documents. Ms. Lerner noted that the Commission already has agreed, in writing, to pay moving and insurance costs, but indicated that a full inventory would be so time consuming and costly as to defeat the purpose of moving the documents to Washington. She also questioned the need for an inventory since the committee did not require one when it originally relinquished custody of the documents to the Commission. In response to your request for an exit conference, Ms. Lerner stated that this audit was being conducted pursuant to 2 U.S.C § 437g rather than 2 U.S.C. § 438(b), consequently, there would not be an exit conference.

Ms. Lerner then explained that unless an agreement to move the documents could be reached informally, the Commission would

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have to seek judicial assistance in the matter. She requested you send a letter listing the conditions that you consider mandatory if an agreement is to be reached, so that the appropriate decision may be made. You agreed to do so.

Accordingly, this Office asks that your written response be received at the Commission Offices by the close of business on April 11, 1986. Should you fail to do so, this Office will consider that failure a refusal to agree to the removal of the documents. In that event, or in the event we do not reach an agreement, the Commission will file the appropriate papers with the United States District Court in Dallas. Furthermore, because the Commission cannot absorb the continued expense of storing the documents in Dallas, on Tuesday April 15, 1986, the Commission's auditors will return the documents to your clients until there is a resolution of where the audit will continue. This adjournment of the audit does not constitute a final return of the documents, and the Commission will reconvene the audit with these materials.

I hope that we can agree on this matter, thereby eliminating further litigation and additional expense to all parties.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE SEC
COMMISSION SECRETARY

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April 25, 1986

SENSITIVE
EXECUTIVE SESSION
Submitted Late

APR 29 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Late Submission to the Commission Agenda of April 29, 1986, MUR 1837

The Office of the General Counsel requests that the attached report be added to the Commission's April 29, 1986 agenda. In order to avoid any further delay in requesting judicial assistance in this document, we request this matter be considered on an expedited basis.

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BEFORE THE FEDERAL ELECTION COMMISSION

In The Matter Of	)	
	)	MUR 1837
Friends of Phil Gramm and John Baxter, as treasurer	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter arose from a complaint filed on October 31, 1984, by Ms. Donna Mobley of Austin, Texas, against Friends of Phil Gramm and John Baxter, as treasurer, ("the Committee") and 170 other persons. On March 5, 1985, the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. §§ 434(b) (8), 434(b) (5) (A), 441a(f), and 434(b) (3) (A), as well as 11 C.F.R. § 102.17. The Commission also authorized an audit of the Committee pursuant to 2 U.S.C. § 437g(a)(2).

Upon the Committee's refusal to permit this audit, on June 20, 1985, the Commission subpoenaed the Committee's books and records. On June 24, 1985, the Commission denied respondents' motion to quash the subpoena and authorized the Office of the General Counsel to file suit in Texas for the enforcement of this subpoena.

The Commission filed a petition for subpoena enforcement on August 3, 1985 and, on October 31, 1985, a show cause hearing was held on the relevancy of the Commission's subpoena. This hearing was suspended to permit discussions between the parties regarding the scope of the Commission's subpoena. A tentative agreement was reached and this Office was directed by the court to write an order for the parties to stipulate to.

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Negotiations on this order reached an impasse. Thereafter, both this Office and respondents submitted proposed orders to the court. On January 16, 1986, Judge Robert Porter signed the Commission's order with minor modifications. Following further discussions with the Committee's staff, the audit commenced on February 19, 1986.

II. RELOCATION OF THE AUDIT SITE TO WASHINGTON

On March 12, 1986, after discussing the matter with this Office, the Audit staff contacted counsel for the respondents to obtain permission to move the Committee's records to Washington for completion of the audit. (Attachment I) When counsel failed to agree, the auditors returned to Washington and met with OGC staff. Following these meetings, OGC staff contacted the Committee's counsel in a further attempt to reach an agreement concerning the move, but were unsuccessful. Subsequently, on April 1, 1986, the Office of the General Counsel received Commission authorization to seek judicial assistance in relocating the audit site. On April 9, 1986, the General Counsel sent an additional letter to counsel for the respondents. (Attachment II) This letter reiterated the Commission's relocation request, and asked for a written response by April 11, 1986. The letter also stated that this Office would consider a failure to respond by that date a refusal to agree to the relocation.1/ The auditors returned the subpoenaed materials

1/ The letter also stated that the Commission would return the documents to the Committee on April 15, 1986, until the issue of the site of the audit is resolved. At the request of counsel for the respondents, however, the return occurred on April 10, 1986.

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to the Committee, expressly stating that this return did not constitute a conclusion to the audit.

On April 15, 1986, this Office received a letter from counsel for the respondents setting forth five conditions under which his clients would agree to permit the subpoenaed materials to be moved to Washington, D. C. (Attachment III) These conditions are cited as follows:

1. The FEC gives respondents an agreed time (not to exceed four weeks after arrival in Washington) when the records will be returned to Dallas.

2. All removal and return of the records will be at the expense of the FEC.

3. In the event any records are lost, no action or complaint based on a lost record would be maintained. To protect against the respondents' assertion of a lost record, the FEC should have a detailed inventory of items removed and items returned. Such a log should be signed and approved by both parties.

4. The records while in Washington will be kept clearly segregated from other FEC records (preferably in a separate room) and would be available to the Committee's lawyers, paralegals and accountants as well as staff assistants of the Senator during regular business hours. The Committee does not believe this will be frequent.

5. The FEC would afford the respondents "the courtesy of a normal audit exit conference and furnish [the respondents] a copy of interim or preliminary audit."

As discussed below, this Office has reservations about most of these conditions.

Condition One. Agreeing to a specific completion date for the

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auditors' review of the materials is not advised. Although the auditors believe a review can be completed within three weeks of their receipt of the subpoenaed materials (See Attachment I), such an agreement would limit the Commission's unqualified right of possession to the materials and would limit the auditors' ability to further review these documents in the event of an unforseen delay. Thus, this condition is not acceptable as set forth.

Condition Two. In a March 13, 1986 letter the Audit Division told respondents' counsel that the records would be shipped both ways at Commission expense, including insurance. Thus, this Office has no objection to this condition.

Condition Three. It is the recommended opinion of this Office that this condition should not be met. The Committee seeks limitation of the Commission's enforcement powers in the context of lost records. This Office has grave reservations about ever permitting a respondent to limit the scope of the Commission's enforcement authority. Although the Commission may chose not to pursue a violation where the underlying documents have been lost, this is a prosecutorial decision that only the Commission can make.

Moreover, even if the Commission would agree to some limitation, respondents' condition is too broad. As currently worded, it would bar any further investigation in this matter should respondents claim a record was lost - even in instances where the Commission has other evidence of a possible violation. Furthermore, this condition precludes any action being taken on

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any new complaint where the allegations encompass a lost Committee record, even in the face of independent evidence. Thus, this condition effectively bars the Commission from investigating whenever the Committee claims that a single document has been misplaced.

Condition Three also calls for a detailed inventory of the contents of approximately 60 boxes of subpoenaed documents. The Commission's auditors have informed this Office that a detailed accounting of every document in these boxes would probably require as much time as the auditors need to complete the remainder of this audit. Furthermore, because the documents are now in Dallas, the audit staff would be required to remain in Dallas until the inventory has been completed. Conducting such a detailed accounting of the documents prior to moving would be so time-consuming and expensive as to defeat the purpose for the relocation of the audit materials. Finally, it is difficult to understand why the Committee is including this condition when it previously turned the records over to the Commission's auditors without such a detailed inventory.2/

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2/ This Office notes the the statement in respondents' April 14, 1986, letter from counsel regarding the auditors refusal to sign even a cursory inventory of the records even though requested, is not accurate. When the auditors checked the contents of the boxes against the inventory presented by the Committee, they discovered that certain documents listed in the inventory were not in the boxes. Consequently, they were unable to sign the inventory at that time. By the time these documents were presented, the audit was well underway and the Committee's representatives no longer felt it necessary to have the auditors sign the inventory.

Condition Four. The auditors have indicated that this condition is acceptable, provided the Committee understands such disruptions are kept to a minimum. (While the auditors were in Texas the Committee requested access to the materials on only one occasion. Such requests should not be accelerated dramatically while the subpoenaed materials are in Washington, D.C.).

Condition Five. The General Counsel's Office believes this condition is not acceptable. The Committee is attempting to make an exit conference mandatory in the context of an audit conducted pursuant to the Commission's enforcement powers. Because it is the Commission's role to evaluate the evidence gathered in the course of an investigation to determine whether violations have occurred, and the extent of any such violations, it is inappropriate for the respondents to be apprised of the auditors' investigative findings prior to the Commission's consideration of those findings. Moreover, premature disclosure of the evidence discovered in an investigation could hamper the Commission's flexibility and discretion in determining how to pursue any possible violations.

In light of the foregoing, this Office recommends that the Commission reject the respondents' conditions and send the letter at Attachment 4.

Should the Commission decide it wishes to further negotiate this matter, this Office has prepared an alternative letter to counsel for the respondents containing counter-proposals to most of his conditions (Attachment 5). As discussed below, these

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counterproposals limit the scope of the respondents' conditions. Condition One. The Commission could agree to make every effort to return the subpoenaed materials expeditiously. If unexpected delays occur, respondents would be notified as soon as possible. Condition Three. The Commission could agree not to pursue the respondents for failure to keep records due to the absence of any records lost between the time the records are turned over to the FEC and the time they are returned to the respondents. Moreover, in the event records are lost, for which the auditors have maintained copies, the Commission could agree that the auditors would furnish such copies to the respondents.

With regard to respondents' demand for a detailed inventory, this Office suggests a continuation of the type of accounting method used thus far by the Committees' representatives and the Commission's auditors. This method lists each box by number and provides a brief description of the type of documents within the box.

Condition Five. As explained above, this Office advises against both an exit conference and an audit report in the context of an audit conducted pursuant to the Commission's enforcement powers. In light of the apparent good working relationship between the Committee's financial representatives and the Commission's auditors, however, this Office does not object to a continuation of their informal communications in the context of the audit. Indeed, such communications are beneficial by permitting the auditors to resolve questions concerning the Committee's books

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and records prior to their formal report to the Office of the General Counsel. These communications should be limited to information gathering by the Commission's auditors and should not provide the Committee's representatives with the auditors' substantative findings. In any event, neither an exit conference nor an audit report should be afforded.

RECOMMENDATIONS

1. Reject the conditions set forth in the April 14, 1986, letter from counsel for the respondents.

2. Approve and send the letter at Attachment 4.

24 April 1986
Date

Charles N. Steele
General Counsel

Attachment
1. Letter from Audit Division
2. Letter from OGC
3. Letter from James Schoener
4. Letter to Mr. Schoener
5. Letter to Mr. Schoener

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 13, 1986

Mr. James F. Schoener
McGuiness & Williams
1015 Fifteenth Street, NW
Washington, D.C. 20005

Dear Mr. Schoener:

The purpose of this letter is to reduce to writing the requests made by Rick Halter and Marty Favin of the Audit Division on March 12, 1986 in separate telephone conversations with you in your capacity as Counsel to Friends of Phil Gramm.

The Audit Division wishes to change the site of the court-ordered audit of the Friends of Phil Gramm from the Quality Inn in Dallas, Texas, to the Federal Election Commission in Washington, D.C. Accordingly, we are requesting removal of the materials listed in the court's order to the Commission's offices. The purpose of this relocation is to conclude the fieldwork in the most efficient manner.

The records will be shipped at Commission expense (both ways) via United Parcel Service including insurance for a reasonable amount. The Audit Division's review of these records should be completed within three weeks of our receipt (not including delivery time of 5 business days each way). Finishing the audit fieldwork in Washington, D.C. will permit the Commission to devote greater staff resources to this project, and thus ensure the completion of the audit more expeditiously. Upon completion of our review, the records will be shipped back to a location of your choice in Dallas. We expect the records to be returned no later than Friday, April 18, 1986, assuming the carrier picks up the records on March 14, 1986.

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ATTACHMENT #1(a)

It is my opinion that completion of the audit fieldwork in Washington, D.C. will be beneficial to all parties concerned. Because of the need to make necessary shipping arrangements and the mounting expenses of maintaining the audit site in Dallas, we ask that you respond to this request by the close of business today, March 13, 1986. It is my hope that we may resolve this matter without resort to further legal action.

Should you have any questions, please contact Rick Halter or Tom Nurthen at (202) 376-5320.

Sincerely,

Robert J. Costa
Assistant Staff Director
for the Audit Division

cc: Mr. John P. Baxter
Treasurer

Mr. Stan Huckaby

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FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

APR 1986
RECEIVED
M.C.P. & S.
9 12:38

April 9, 1986

HAND DELIVERED

James Schoener, Esquire
McGuiness & Williams
1015 15th Street, N.W.
Washington, N.W. 20005

Re: MUR 1837
Friends of Phil Gramm and
John Baxter, as treasurer

Dear Mr. Schoener:

This is to confirm your April 8, 1986 conversation with Lois Lerner of this Office regarding relocation of Friends of Phil Gramm's records to Washington, D.C. pending completion of the Commission's audit of the committee. During that conversation, Ms. Lerner explained that because of current budgetary constraints, the Commission has decided to conduct the remainder of the audit in Washington, D.C. Consequently, Ms. Lerner reiterated the Commission's request that you agree to removal of the subpoenaed documents to Washington, D.C.

In response, you indicated you were unwilling to agree to this move unless the Commission meets certain conditions, among them: holding an exit conference, paying all moving and insurance costs, providing a full inventory of all documents moved and agreeing that the Commission will take no further action regarding all violations involving lost documents. Ms. Lerner noted that the Commission already has agreed, in writing, to pay moving and insurance costs, but indicated that a full inventory would be so time consuming and costly as to defeat the purpose of moving the documents to Washington. She also questioned the need for an inventory since the committee did not require one when it originally relinquished custody of the documents to the Commission. In response to your request for an exit conference, Ms. Lerner stated that this audit was being conducted pursuant to 2 U.S.C § 437g rather than 2 U.S.C. § 438(b), consequently, there would not be an exit conference.

Ms. Lerner then explained that unless an agreement to move the documents could be reached informally, the Commission would

ATTACHMENT # 2(1)

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have to seek judicial assistance in the matter. She requested you send a letter listing the conditions that you consider mandatory if an agreement is to be reached, so that the appropriate decision may be made. You agreed to do so.

Accordingly, this Office asks that your written response be received at the Commission Offices by the close of business on April 11, 1986. Should you fail to do so, this Office will consider that failure a refusal to agree to the removal of the documents. In that event, or in the event we do not reach an agreement, the Commission will file the appropriate papers with the United States District Court in Dallas. Furthermore, because the Commission cannot absorb the continued expense of storing the documents in Dallas, on Tuesday April 15, 1986, the Commission's auditors will return the documents to your clients until there is a resolution of where the audit will continue. This adjournment of the audit does not constitute a final return of the documents, and the Commission will reconvene the audit with these materials.

I hope that we can agree on this matter, thereby eliminating further litigation and additional expense to all parties.

Sincerely,

Charles N. Steele
General Counsel

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LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005
TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
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KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

April 14, 1986

'86 APR 15 P2:19

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

Re: Audit - Friends of Phil Gramm

Dear Ms. Lerner:

In accordance with our telephone conversation of April 8 and in response to your letter dated April 9th, we submit the following conditions as a basis of our approval of your removal of our 1983-84 campaign records from the Dallas offices of Friends of Phil Gramm. Before we respond to your request we wish to make our position clear.

Let us first state that you agree that our Dallas office has been totally and completely cooperative and obliging in furnishing records, computer access and information during the four weeks your people have been in Dallas. You have had between three and five auditors on the scene during that period and yet your people still indicate they want more time with the records -- this in spite of your original estimate of three auditors working three weeks. We now have heard variously between three and five weeks additional time needed to finish the audit.

Those records (consisting of 57 boxes of materials) have been in the possession of the F.E.C. since the 19th of February in an F.E.C. room in the Quality Motel in Dallas; they were not until now available to us. We have also learned that your people refused to sign even a cursory inventory of these records even though requested. You advised us on April 8 that you desire to return them to us pending further negotiations concerning removal of these records to Washington. We arranged on April 10 to take these records back and they are now in our custody. As you stated, the request to move records is an unusual request and is occasioned by F.E.C. budget constraints. We note that the General Counsel in other cases dropped investigations because of budget constraints, but in our case you ask us to oblige you.

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ATTACHMENT # 3(1)

As I indicated we believe that we have cooperated completely and fully in what we consider a politically inspired complaint that originated this M.U.R. Early on during the campaign we acknowledged the technical error of our accounting methods and we explained the changes in process made in the campaign to correct those errors. In spite of our admission and desire to conciliate, the General Counsel joined approximately 150 of our contributors in the M.U.R. causing great confusion and concern among these people -- later to drop all charges against them without apology or explanation.

Our treasurer admitted misunderstanding the reporting requirements of the F.E.C. and promptly hired one of the most capable certified public accountants in this field to completely review every item in the 1983-1984 campaign. We openly and clearly documented and amended the F.E.C. reports and asked to conciliate the admitted errors. Parenthetically, at the same time, Senator Cranston's Presidential Campaign seemed to have similar but larger problems and the F.E.C. conciliated his M.U.R. by payment of a fine of $1,500. Contrary to the Cranston precedent, the F.E.C. demanded an audit of our campaign and refused to discuss conciliation.

The scope of the "investigatory audit" asserted by the General Counsel far exceeded the parameters of the complaint filed; the audit procedures so far undertaken have also exceeded those allegations. Such actions seem to be contrary to what the authorities have observed in a prominent text in the field. */ Although the auditors held the usual entrance conference, which is a normal part of the F.E.C. audits, they have now advised us that pursuant to the General Counsel's order, they cannot give us the courtesy of an exit conference which is also a usual and normal audit procedure. We believe that such a procedure could materially reduce the areas of conflict and could lead to simplification of the issues to be ultimately presented to the Commission as a conciliation agreement or request for suit.

Although we believe that the continued audit is unnecessary and undue harassment of this committee and not usual for this type of case, and although we believe you should examine our records in the Dallas area, we nonetheless would be willing to consent to the transfer of those records to your F.E.C. offices in Washington on the following terms:

---

*/ Federal Regulation of Campaign Finance and Political Activity, Schwartz and Straus, Mathew Bender. See also the Court's comments regarding "procedural protections" in Reagan-Bush v. Federal Election Committee 525 F. Supp. 1330 (D.D.C. 1981).

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1. That you give us an agreed time (not to exceed 4 weeks after arrival in Washington) when the records will be returned to Dallas.

2. All removal and return of the records to be at the expense of the F.E.C.

3. In the event any records are lost, no action or complaint based on a lost record would be maintained. To protect against our assertion of a lost record, you should have a detailed inventory of items removed and items returned. Such a log should be signed and approved by both parties.

4. The records while in Washington will be kept clearly segregated from other F.E.C. records (preferably in a separate room) and would be available to the committee's lawyers, paralegals and accountants as well as staff assistants of the Senator during regular business hours. We do not believe this will be frequent.

5. You would afford us the courtesy of a normal audit exit conference and furnish us a copy of the interim or preliminary audit.

Obviously, an additional alternative is to make copies of the records you need and take them with you to Washington. We believe that these conditions are sensible and proper and accomodate both sides to this issue.

Finally, as we have expressed from the very first response made to the Mosley complaint, we desire to enter into voluntary compliance as set forth in the statute and we urge your statutory reciprocal duty to conduct your investigations "expeditiously."

Sincerely,

James F. Schoener

James F. Schoener

JFS/cbw

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Friends of Phil Gramm and	)	MUR 1837
John Baxter, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 29, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1837:

1. Reject the conditions set forth in the April 14, 1986, letter from counsel for the respondents.

2. Approve and send the letter at Attachment 4 of the General Counsel's report signed April 24, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald, and McGarry voted affirmatively for the decision.

Attest:

4-29-86
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 29, 1986

HAND DELIVERED

James F. Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street N.W.
Washington, D. C. 20005

Re: MUR 1837
The Friends of Phil Gramm and
John Baxter, as Treasurer

Dear Mr. Schoener:

On April 29, 1986, the Commission reviewed the conditions set forth in your April 15, 1986 letter regarding the removal of the subpoenaed documents to Washington, D. C. and determined that Conditions One, Three and Five are unacceptable.

Specifically, the Commission cannot agree to limit its right to possession of these materials as you request in Condition One. Although the Commission would make every effort to return these materials expeditiously, the chance of an unforseen delay makes it impossible to agree to this condition as set forth.

Additionally, the Commission cannot agree to Condition Three because it restricts the Commission in carrying out its statutory obligation to investigate allegations of violations of the Act. The Commission cannot permit a respondent to define the scope of its investigation. Moreover, as worded, the condition bars a Commission investigation in any instance where the Committee asserts a lost document. This is unacceptable.

Condition Three also seeks a detailed inventory of all documents moved. The Commission cannot agree to this condition as stated because such a detailed accounting would be so costly and time consuming as to defeat the purpose for removal of the subpoenaed documents to Washington, D. C. Furthermore, such a request appears unreasonable in light of the fact that your clients previously turned the documents over to the Commission's auditors using a less detailed accounting method.

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Finally, your requests for an exit conference and an audit report cannot be granted. It is inappropriate to notify respondents of the findings of a Commission investigation prior to the time those findings are considered by the Commission. In the event further reason to believe findings are made based on evidence obtained during the audit, respondents will be notified and afforded an opportunity to respond.

Accordingly, the Office of the General Counsel will seek judicial assistance in this matter from the United States District Court in Dallas.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1986

HAND DELIVERED

James Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteen Street, N.W.
Washington, D.C. 20005

RE: MUR 1837
The Friends of Phil Gramm
and John Baxter,
as treasurer

Dear Mr. Schoener:

This is to confirm your May 27, 1986 telephone conversation with Lois Lerner of this Office, concerning the court's recent order permitting removal of the Friends of Phil Gramm's records to Washington, D.C. for the completion of the Commission's audit of the Committee. With regard to the court's condition that an agreed inventory of the records be provided, Ms. Lerner suggested that the best way to move along this already delayed audit was to use the general inventory agreed on by both parties on April 10, 1986, when the Commission's auditors returned the records to the Committee. At the time that inventory was agreed to, the boxes containing the records were sealed and returned to your clients. Ms. Lerner suggested, therefore, that the sealed boxes be sent to the Commission and remain unopened until a representative from your office could verify that the seals had not been broken in transit.

You responded that such an inventory was unacceptable and that you wanted an inventory of each and every document contained in the boxes. You further stated that after determining it would cost $2,000 to $3,000 to have the Committee's accountant present during the inventory, you arranged to have Don White, who is already on the committee's payroll, available for the task. You told Ms. Lerner that you expected a representative of the Commission also to be present during the taking of the inventory. Ms. Lerner explained that it would be too costly to send an auditor to Dallas to inventory each and every document, especially in light of the budget constraints that prompted the Commission to seek to move the audit site to Washington, D.C. She further indicated that, if your clients insist upon such an

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inventory, they should notify this Office when it is completed, after which the Commission will send an auditor to Dallas to verify the inventory. You responded that, under your interpretation of the court's order, the inventory is to be completed jointly. Ms. Lerner pointed out that the order only requires an "agreed inventory", and does not require that the parties physically complete the inventory together. Thereafter, Ms. Lerner specifically asked whether you were refusing to conduct the inventory unless a Commission representative was present. You responded affirmatively.

This Office has suggested two reasonable means for reaching an accommodation on this issue. You have refused both alternatives, despite that fact that the second alternative would provide you with the detailed accounting you seek. Although we prefer to resolve this matter informally, your refusal to move from a position that we beleive is unreasonable leaves us no choice but to ask the court to intervene once again. Accordingly, if we do not have an agreement providing for a reasonable inventory which can be completed within a limited time by the close of business on Monday, June 2, 1986, we will return to court on this matter.

Should you wish to discuss this further, please contact Ms. Lerner at 376-8200.

Sincerely,

Charles N. Steele
General Counsel

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GCC 634

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
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KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

2 P5:55

June 2 ~~May 29~~, 1986

Charles Steele, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 1837

Dear Mr. Steele:

Your hand delivered letter of May 29 has been received. First of all, factually, I wish to correct some of the statements in your letter. Regarding the April 10 inventory, Ms. Lerner advised me that your auditors refused to sign it originally and that they disagreed with its terms. Second, as I indicated to her, our auditors were satisfied with a less than complete inventory when the records were handled completely by our people on a short distance from our offices to the Best Western Motel your auditors had in Dallas. Since we made the delivery, we were confident no records were lost. We trusted your auditors to keep those records in a separate and secured room; we believe that they complied. The contrast to the cursory inventory we prepared at that time to what we believe proper for moving about 500,000 pieces of paper several thousand miles by common carrier is an entirely different matter.

We believe that your Commission should not place the burden on our office to complete the inventory at this time. The removal is at your request and we are willing to cooperate--but this attempt to shift the obligation to our personnel is just not fair.

We have been ready since Tuesday, May 27 to have Col. White available to cooperatively make up the inventory, but we will not do your work for you. We do not believe Judge Porter meant that

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we do the inventory and you take the records (if you agree).

Should you wish to discuss this further, please call me at your convenience.

Very truly yours,

James F. Schoener

James F. Schoener

JFS:bab

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LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005
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LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

June 12, 1986

JAMES F. SCHOENER
(202) 789-8643

HAND DELIVERED

MUR 1837

86 JUN 12 P3:48

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Patty Reilly, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C.

Re: Friends of Phil Gramm

Dear Ms. Reilly:

You called my office this morning to ask again that our Committee unilaterally prepare an inventory of the records of our Committee so that those records can be transported to Washington for further examination by Federal Election Commission auditors. As I advised you, our people are ready (and have been ready since early May) to go through the boxes of records with your people to create an agreed inventory of these documents as prescribed in the Federal Court order.

We believe the most fair and safe manner of handing over these records would have been to Xerox all of the relevant documents. We believe that when your five auditors were in Dallas for four weeks, during which you had uninterrupted possession of the records, you had the opportunity to copy every document of concern to you. Suffice to say, apparently you did not do so and have now requested the removal of our documents. These documents, of course, are used by the Committee for many purposes other than F.E.C. records, therefore, the Committee is extremely reluctant to have them moved several thousand miles under circumstances beyond our control.

You now advise that you propose to ask Judge Porter to further define what procedure will be used to make the ordered "agreed inventory." We believe that the United States Federal District Court should not be required to consider such a petty matter.

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Since you have rejected any form of jointly created inventory or to even discuss or negotiate such a procedure, the Committee is willing to waive any "agreed inventory" if the Commission will accept complete responsibility for any and all documents that are missing when they are returned to the Committee.

Very truly yours,

James F. Schoener

James F. Schoener

JFS:bab

8204074407

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

With regard to the 56 boxes of documents subpoeaned from the Friends of Phil Gramm and shipped from Dallas, Texas on June 25, 1986, and arriving in Washington, D.C. on July 1, 1986, we hereby certify:

1) The boxes were opened in our presence using the same inventory used by the parties when the documents were shipped (copy attached). with the exception of boxes 10, 17 and 26, 27

2) None of the seals on the boxes had been broken in transit and it did not appear that the documents had been tampered with.

For the Federal Election Commission

Date 7/1/86

Lois G. Lerner

For the Friends of Phil Gramm

James F. Schoener

James F. Schoener

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
The Friends of Phil Gramm, and) MUR 1837
John Baxter, as treasurer)

COMPREHENSIVE INVESTIGATIVE REPORT #1

I. BACKGROUND

This matter arose from a complaint filed on October 31, 1984, by Ms. Donna Mobley of Austin, Texas against The Friends of Phil Gramm, and John Baxter, as treasurer ("the Committee") and 170 persons. On March 5, 1985, the Commission found reason to believe the Committee violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), 434(b)(3)(A), as well as 11 C.F.R. § 102.17. The Commission also authorized an audit of the Committee pursuant to 2 U.S.C. § 437g(a)(2).

Following the Committee's refusal to produce its records voluntarily, the Commission issued a subpoena for documents on June 20, 1985. After denying respondents' motion to quash this subpoena, the Commission authorized the Office of the General Counsel to file a petition for subpoena enforcement in Dallas, Texas. At an October 31, 1985 show cause hearing, the parties tentatively agreed on the scope of this subpoena, and this Office was directed to write an order for the parties' stipulation. When negotiations regarding this order reached an impasse, the parties each submitted proposed orders. On January 16, 1986, the court enforced the Commission's order, with minor modifications.

II. RELOCATION OF THE AUDIT SITE

The audit commenced on February 19, 1986 in Dallas, Texas.

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It soon became apparent that completeing the audit in Texas would be too time consuming and expensive considering the budget constraints facing the Commission. Accordingly, the auditors and the Office of the General Counsel asked the respondents to permit the relocation of the audit site to Washington, D.C., where the audit could be completed in a more expeditious and economical manner. On April 1, 1986, after the respondents refused to agree to this relocation, this Office received Commission authorization to seek judical assistance in relocating the audit site. This Office notified respondents of this determination. The respondents then submitted a series of conditions under which they would agree to relocation. Because these conditions required the Commission to limit its enforcement powers and apprise respondents of the progress of an ongoing investigation, on April 29, 1986, the Commission determined not to agree to these conditions. The Office of the General Counsel then returned to court.

On May 16, 1986, the court granted the Commission's Motion to Clarify, subject to four conditions. (Attachment 1). The last of these conditions was "that an agreed inventory of the removed records be provided." The respondents interpreted this provision to require a piece by piece inventory of over 500,000 documents to be conducted jointly by the Commission and respondents. (See Attachment 2). This procedure would be more expensive and time consuming than the audit itself, and therefore counter productive to the court's order permitting removal of the

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records. This Office, therefore, suggested that if respondents wanted to conduct such a detailed inventory they should go ahead, and when it was completed the Commission's auditors would spot-check the inventory for accuracy. Alternatively, this Office suggested utilizing an inventory provided by the Commission's auditors and signed by the Committee's representatives when the records were returned to the Committee on April 10, 1986. Additionally, the Office of the General Counsel agreed to entertain all reasonable proposals by the respondents to meet the court's inventory requirement.

Counsel for the respondents did not accept any of these alternatives. Instead, he steadfastly maintained that an exhaustive agreed inventory must be completed by the parties as a joint undertaking. (Attachment 3). In light of this refusal, on June 12, 1986, the Office of the General Counsel filed additional papers with the District Court in Texas seeking further clarification of the court's joint inventory requirement. On that date, following notification to respondents' counsel of the mailing of the court papers, counsel agreed to "waive any joint inventory," provided the Commission is responsible for lost documents. (Attachment 4) On June 13, 1986, in a letter to counsel, this Office indicated that the Commission would take responsibility for any documents lost while in its possession, and requested the Committee to make the subpoenaed materials

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available to the Commission's auditors in Dallas to be verified using the April 10, 1986 inventory. (Attachment 5). Following counsel's oral agreement to this request, this Office withdrew its court papers and so informed counsel. (See Attachments 6 and 7). On June 25, 1986, a member of the audit staff traveled to Texas, obtained and verified the subpoenaed materials, and arranged to ship them to the Commission's Offices. These boxes will be opened in the presence of the Committee's representatives and verified using the April 10, 1986 inventory.

Following the completition of the audit and a review of the audit report, this Office will return to the Commission with appropriate recommendations.

Charles N. Steele
General Counsel

7/2/86
Date

BY: [signature]
Lawrence M. Noble
Deputy General Counsel

Attachments
1. Order Granting Motion to Clarify
2. OGC Letter to FPG Counsel - 5/29/86
3. Counsel's Letter to OGC - 6/2/86
4. Counsel's Letter TO OGC - 6/12/86
5. OGC Letter to FPG Counsel - 6/13/86
6. OGC Letter to FPG Counsel - 6/19/86
7. OGC Letter to Court - 6/19/86

8204074080

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
MAY 16 1986
NANCY HALL DOHERTY, CLERK
BY _____ DEPUTY

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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF TEXAS

DALLAS DIVISION

FEDERAL ELECTION COMMISSION	)	
	)	
VS.	)	NO. CA3-85-1507-F
	)	(CLOSED CASE)
	)	
FRIENDS OF PHIL GRAMM and	)	
JOHN BAXTER, as treasurer	)	

ORDER GRANTING MOTION TO CLARIFY THE COURT'S ORDER

Motion having been made by the Federal Election Commission for an order clarifying the Court's January 16, 1986 Order Enforcing the Petitioner's Subpoena for Documents, and the Court having considered said motion and the response thereto, is of the opinion said Motion is well taken. Accordingly,

It is hereby ORDERED that the motion to clarify the Court's January 16, 1986 Order is GRANTED upon the following conditions:

1. that all removal and return of the records be at the expense of the Petitioner;

2. that while the records are in Washington they shall be segregated from other FEC records to the extent practicable;

3. that the records would be available to respondents and their staff during regular business hours;

4. that an agreed inventory of the removed records be provided.

Signed and ENTERED this 16 day of May, 1986.

ROBERT W. PORTER
UNITED STATES DISTRICT JUDGE

6 MAY 22 P3:51

GENERAL

ATTACHMENT #1

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1986

HAND DELIVERED

James Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteen Street, N.W.
Washington, D.C. 20005

RE: MUR 1837
The Friends of Phil Gramm
and John Baxter,
as treasurer

Dear Mr. Schoener:

This is to confirm your May 27, 1986 telephone conversation with Lois Lerner of this Office, concerning the court's recent order permitting removal of the Friends of Phil Gramm's records to Washington, D.C. for the completion of the Commission's audit of the Committee. With regard to the court's condition that an agreed inventory of the records be provided, Ms. Lerner suggested that the best way to move along this already delayed audit was to use the general inventory agreed on by both parties on April 10, 1986, when the Commission's auditors returned the records to the Committee. At the time that inventory was agreed to, the boxes containing the records were sealed and returned to your clients. Ms. Lerner suggested, therefore, that the sealed boxes be sent to the Commission and remain unopened until a representative from your office could verify that the seals had not been broken in transit.

You responded that such an inventory was unacceptable and that you wanted an inventory of each and every document contained in the boxes. You further stated that after determining it would cost $2,000 to $8,000 to have the Committee's accountant present during the inventory, you arranged to have Don White, who is already on the committee's payroll, available for the task. You told Ms. Lerner that you expected a representative of the Commission also to be present during the taking of the inventory. Ms. Lerner explained that it would be too costly to send an auditor to Dallas to inventory each and every document, especially in light of the budget constraints that prompted the Commission to seek to move the audit site to Washington, D.C. She further indicated that, if your clients insist upon such an

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ATTACHMENT # 2(1)

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This Office has suggested two reasonable means for reaching an accommodation on this issue. You have refused both alternatives, despite that fact that the second alternative would provide you with the detailed accounting you seek. Although we prefer to resolve this matter informally, your refusal to move from a position that we beleive is unreasonable leaves us no choice but to ask the court to intervene once again. Accordingly, if we do not have an agreement providing for a reasonable inventory which can be completed within a limited time by the close of business on Monday, June 2, 1986, we will return to court on this matter.

Should you wish to discuss this further, please contact Ms. Lerner at 376-8200.

Sincerely,

Charles N. Steele
General Counsel

8904074408 3

GCC 634

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1862-1949)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

TELEPHONE (202) 789-8640

JAMES F. SCHOENER
(202) 789-8643

86 JUN 2 P5:55

June 2 ~~May 29~~, 1986

Charles Steele, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 1837

Dear Mr. Steele:

Your hand delivered letter of May 29 has been received. First of all, factually, I wish to correct some of the statements in your letter. Regarding the April 10 inventory, Ms. Lerner advised me that your auditors refused to sign it originally and that they disagreed with its terms. Second, as I indicated to her, our auditors were satisfied with a less than complete inventory when the records were handled completely by our people on a short distance from our offices to the Best Western Motel your auditors had in Dallas. Since we made the delivery, we were confident no records were lost. We trusted your auditors to keep those records in a separate and secured room; we believe that they complied. The contrast to the cursory inventory we prepared at that time to what we believe proper for moving about 500,000 pieces of paper several thousand miles by common carrier is an entirely different matter.

We believe that your Commission should not place the burden on our office to complete the inventory at this time. The removal is at your request and we are willing to cooperate--but this attempt to shift the obligation to our personnel is just not fair.

We have been ready since Tuesday, May 27 to have Col. White available to cooperatively make up the inventory, but we will not do your work for you. We do not believe Judge Porter meant that

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ATTACHMENT # 3(1)

we do the inventory and you take the records (if you agree).

Should you wish to discuss this further, please call me at your convenience.

Very truly yours,

James F. Schoener

James F. Schoener

JFS:bab

8900407440805

Cr-709

HAND DELIVERED

86 JUN 12 P3:38

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005
TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1926)
LEWIS H. PADDOCK (1866-1935)
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DETROIT, MICHIGAN
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GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

MUR 1837 / Reilly

June 12, 1986

JAMES F. SCHOENER
(202) 789-8643

HAND DELIVERED

86 JUN 12 P3:48

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Patty Reilly, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C.

Re: Friends of Phil Gramm

Dear Ms. Reilly:

You called my office this morning to ask again that our Committee unilaterally prepare an inventory of the records of our Committee so that those records can be transported to Washington for further examination by Federal Election Commission auditors. As I advised you, our people are ready (and have been ready since early May) to go through the boxes of records with your people to create an agreed inventory of these documents as prescribed in the Federal Court order.

We believe the most fair and safe manner of handing over these records would have been to Xerox all of the relevant documents. We believe that when your five auditors were in Dallas for four weeks, during which you had uninterrupted possession of the records, you had the opportunity to copy every document of concern to you. Suffice to say, apparently you did not do so and have now requested the removal of our documents. These documents, of course, are used by the Committee for many purposes other than F.E.C. records, therefore, the Committee is extremely reluctant to have them moved several thousand miles under circumstances beyond our control.

You now advise that you propose to ask Judge Porter to further define what procedure will be used to make the ordered "agreed inventory." We believe that the United States Federal District Court should not be required to consider such a petty matter.

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ATTACHMENT # 4(1)

Since you have rejected any form of jointly created inventory or to even discuss or negotiate such a procedure, the Committee is willing to waive any "agreed inventory" if the Commission will accept complete responsibility for any and all documents that are missing when they are returned to the Committee.

Very truly yours,

James F. Schoener

James F. Schoener

JFS:bab

8904074400827

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 13, 1986

HAND DELIVERED

James F. Schoener, Esquire
Miller, Canfield, Paddock & Stone
Suite 1200
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

RE: The Friends of Phil Gramm
and John Baxter, as
treasurer

Dear Mr. Schoener:

The Office of the General Counsel is in receipt of your June 12, 1986 letter regarding the inventory of the subpoenaed audit materials currently located in Dallas, Texas.

As a preliminary matter, your statement in this letter that the Commission has been unwilling to negotiate a jointly created inventory is without support. As noted in my May 29, 1986 letter, the Office of the General Counsel has been willing to utilize the April 10, 1986 inventory that was jointly created by the parties to the audit. Moreover, we have stated that we are willing to use a detailed inventory compiled by your clients, however, budgetary constraints prevent the Commission from sending personnel to Dallas to complete a protracted joint inventory. These constraints are the very reason the Commission sought this change in audit site. Additionally, we have stood ready to entertain any other reasonable proposal regarding the creation of this inventory.

Your June 12 letter states that your clients are willing to waive any "agreed inventory" provided the Commission agrees to be responsible for any missing documents. The Commission requests therefore, that your clients make available in Dallas, Texas the sealed boxes containing the subpoenaed materials. The Commission's auditors will verify these boxes using the April 10, 1986 inventory and will arrange to ship these boxes to Washington,D.C. The Commission will pay the transportation and insurance costs for this move. When these boxes arrive at the

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Commission's offices they will be accounted for, and their seals broken, in the presence of FPG's representatives using the April 10, 1986 inventory. The Commission will take responsibility for any documents lost while in our possession. Upon the completion of the audit, these doocuments will be boxed and sealed in the presence of FPG's representatives and returned to a location in the Dallas area designed by FPG. The Commission will again pay for the transportation and insurance costs.

Accordingly, upon your written confirmation of this agreement, the Commission will withdraw its court papers filed on June 16, 1986 with the Northern District Court in Dallas, Texas.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1986

James F. Schoener, Esquire
Miller, Canfield, Paddock & Stone
Suite 1200
1015 Fifteenth Street N.W.
Washington,D.C. 20005

RE: The Federal Election v.
The Friends of Phil Gramm
and John Baxter, as
treasurer CA3-1507-F

Dear Mr. Schoener:

This is to confirm your June 17, 1986 telephone conversation with Lois Lerner of the Office of the General Counsel. In that conversation you stated that the Commission should contact Colonel Don White regarding arrangements for shipping the subpoenaed documents from Dallas, Texas to the Commission's offices in Washington, D.C. You further stated that the Commission should use the April 10, 1986 inventory signed by your clients' representative during the move process. Because your clients are unable to locate a copy of that inventory, the Commission's auditors will provide Colonel White with a copy of it when they meet with him in Dallas.

In light of your agreement to release these documents to the Commission's auditors, the Commission will withdraw its court papers filed with the United States District Court in Dallas, Texas.

Sincerely,

Charles N. Steele
General Counsel

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ATTACHMENT #6

PR

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1986

Nancy Doherty, Clerk
United States District Court for
the Northern District of Texas
United States Courthouse
1100 Commerce Street
Room 15E 26J
Dallas, TX 75242

RE: The Federal Election Commission v. the Friends of Phil Gramm and John Baxter, as treasurer
CA3-85-1507-F (CLOSED CASE)

Dear Ms. Doherty:

The Federal Election Commission ("the Commission") and the Respondents have reached an agreement regarding the movement of certain subpoenaed records from Dallas, Texas to Washington, D.C. (See Attachments 1-3). Accordingly, the Commission hereby requests to withdraw its most recently filed papers seeking further clarification of the court's order enforcing the Commission's subpoena for documents.

If you have any qestions regarding this matter, please contact Patty Reilly at (202) 376-8200. Thank you for your courtesy and cooperation.

Sincerely,

Charles N. Steele
General Counsel

cc: James Schoener, Esq.

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ATTACHMENT #7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/Mary W. Dove

DATE: July 7, 1986

SUBJECT: MUR 1837 - Comprehensive Investigative Report #1 signed July 2, 1986

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00 a.m., July 3, 1986.

There were no objections to the above-captioned matter.

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In The Matter Of)
) MUR 1837
Friends of Phil Gramm and)
John Baxter, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter arose from a complaint filed on October 24, 1984, by Ms. Donna Mobley of Austin, Texas, against Friends of Phil Gramm and John Baxter, as treasurer, ("the Committee") and 170 other persons. On March 5, 1985, the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), and 434(b)(3)(A), as well as 11 C.F.R. § 102.17. The Commission also authorized an audit of the Committee pursuant to 2 U.S.C. § 437g(a)(2).

Upon the Committee's refusal to permit this audit, on June 20, 1985, the Commission subpoenaed the Committee's books and records. On June 24, 1985, the Commission denied respondents' motion to quash the subpoena and authorized the Office of the General Counsel to file suit in Texas for the enforcement of this subpoena.

The Commission filed a petition for subpoena enforcement on August 3, 1985 and, on October 31, 1985, a show cause hearing was held on the relevancy of the Commission's subpoena. This hearing was suspended to permit discussions between the parties regarding the scope of the Commission's subpoena. A tentative agreement was reached and this Office was directed by the court tc write an order for the parties to stipulate to. After negotiations on

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this order reached an impasse, both parties submitted proposed orders. The Court signed the Commission's order with minor modifications, and the audit commenced on February 19, 1986 in Dallas, Texas.

It soon became apparent that completing the audit in Texas would be too time consuming and expensive considering the budget constraints facing the Commission. The Commission requested respondents' cooperation in relocating the audit site to Washington, D.C. On April 1, 1986, after the respondents refused to agree to this relocation, this Office received Commission authorization to seek judicial assistance to move the subpoenaed materials to Washington, D.C. This Office notified respondents of this determination. Following further negotiations, this Office sought judicial assistance in relocating the subpoenaed materials.

On May 16, 1986, the court granted the Commission's Motion to Clarify, subject to four conditions. The last of these conditions was "that an agreed inventory of the removed records be provided." The respondents interpreted this provision to require a piece by piece inventory of over 500,000 documents to be conducted jointly by the Commission and respondents. Although this Office attempted to provide reasonable alternatives to this condition, respondents steadfastly maintained an exhaustive piece by piece inventory must be conducted. In light of this unreasonable position, on June 12, 1986, the Office of the General Counsel filed additional papers with the District Court in Texas seeking further clarification of the court's joint inventory

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requirement. On that date, following notification to respondents' counsel of the mailing of the court papers, counsel agreed to "waive any joint inventory," provided the Commission is responsible for lost documents. On June 13, 1986, in a letter to counsel, this Office indicated that the Commission would take responsibility for any documents lost while in its possession, and requested the Committee to make the subpoenaed materials available to the Commission's auditors in Dallas to be verified using the April 10, 1986 inventory. Following counsel's oral agreement to this request, this Office withdrew its court papers and so informed counsel. On June 25, 1986, a member of the audit staff traveled to Texas, obtained and verified the subpoenaed materials, and arranged to ship them to the Commission's Offices. These boxes were opened in the presence of the Committee's representatives and verified using the April 10, 1986 inventory.

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II. FUNDS COMPOSING THE HOUSE TRANSFER

As the audit progressed, the auditors sought to verify the Senate Committee's initial cash on hand figure. This amount included $337,327 transferred to the Senate Committee from the Senator's House Re-election Committee ("the House Committee"). The Senate Committee asserts that this entire amount was initially received by the House Commitee prior to the February 12, 1983 Special Election, and is excess campaign funds freely transferable outside of the limitations of 2 U.S.C. § 44la(a).

In reviewing materials supplied by the Committee, the auditors noted that the House Committee included in this transfer to the Senate Committee the following funds deposited after the February 12, 1983 Special Election. 1/

date of deposit	approximate amount
2/14/83	$16,000
2/15/83	$82,000
2/16/83	$59,000
2/18/83	$70,000
	$227,000 2/

In order to assure that these funds were received by the House Committee prior to the Special Election and, therefore, permissibly transferred, the auditors wished to review the actual checks. (Attachment # 1). The Senate Committee ascertained that the House Committee's bank still retained copies of the checks composing the deposits in question, but refused to provide them to the auditors, stating the estimated $400 - $600 retrival cost was prohibitive. In lieu of the check copies composing the previously noted deposits, the Committee states it is willing to provide an affidavit attesting that the checks were received prior to the Special Election but their deposit was delayed. Upon learning this information, the Audit Division contacted this Office regarding the situation. (Attachment #1).

1/ The Special Election was held on Saturday, February 12, 1983. The deposits in question encompass the following week.

2/ The exact amount of these deposits is $228,242.22.

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Notwithstanding the Committee's offer to provide an affidavit on this issue, the Office of the General Counsel believes the better course is to subpoena the checks from the bank. Although the Committee believes only funds received prior to the Special Election were transferred to the Senate Committee, the portions of the audit conducted to date reveal that the Senate Committee's initial record keeping was not accurate. Consequently, the only way to determine whether all funds transferred were permissible is to review the checks themselves. Moreover, this will result in more accurate figures to be used at conciliation. Accordingly, this Office recommends that the Commission approve the attached subpoena for documents to the First City National Bank of Bryan, Texas.

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III. RECOMMENDATIONS

1. Approve the attached subpoena and letter to the First City National Bank of Bryan, Texas.

Charles N. Steele
General Counsel

Date 11/7/86

By: Lawrence M. Noble
Deputy General Counsel

Attachment
1. Memoradum from Audit Division
2. Subpoena
3. Proposed Letter

Kelly

AR-86-3
NRN

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

September 30, 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: MUR 1837, 2 U.S.C. § 437g
AUDIT OF FRIENDS OF PHIL GRAMM

This memorandum (in response to a request from Ms. Lerner of your staff) sets forth the issue and the Audit staff's attempt to obtain the information necessary to render an opinion as to the acceptability of the manner in which Friends of Phil Gramm (Senate committee) accounted for the transaction in question.

In order to complete our analysis of excessive contributions made to/received by the above named committee, the Audit staff must verify the composition of the funds transferred from the Committee to Re-Elect Phil Gramm (House committee) to Friends of Phil Gramm. We need to review the contributor checks deposited between 2/14/83 and 2/18/83 (totalling $228,242.22) in order to verify the committee's assertion that the checks were received on or before 2/12/83 (date of House special election) and therefore constituted excess campaign funds of the House committee not subject to the 2 U.S.C. § 441a(a) limitations for Friends of Phil Gramm.

We requested the Senate committee (see attached letter of August 6, 1986) to determine the feasibility of obtaining photocopies of these checks from the bank. A representative of the Senate committee responded by telephone on 9/19/86 that 1) the bank has a microfilm record of these contributor checks; 2) to retrieve copies would cost between $400 - $600 and would take the bank about 2 weeks; and 3) the Senate committee will not pay for the copies.

ATTACHMENT # 111

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Alternatively, the Senate committee has offered to provide an affidavit. The affidavit would attest to the delay in depositing contributions received just prior to the special election.

The Audit staff is of the opinion that deposits between 2/14/83 and 2/18/83 could have consisted solely of checks dated on or before 2/12/83. However, if these contributor checks were dated after the special election then we need to include these checks in our review of excessive contributions. Without copies of the contributor checks we have no documentary proof that the contributions comprising these deposits are not subject to 2 U.S.C. § 441a(a) limits for the Senate committee.

The Audit staff can render an opinion based on the affidavit. However, it will be noted that substantive documentary evidence was not provided.

If you have any questions or wish to review the workpapers relative to this matter, please contact Marty Favin at 376-5320.

Attachment as stated

2074209

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 6, 1986

Mr. Stan Huckaby
Committee Representative
Friends of Phil Gramm
c/o Huckaby & Associates
228 S. Washington Street, Suite 200
Alexandria, Virginia 22314

Dear Mr. Huckaby:

As discussed during our meeting of July 30, 1986, concerning the audit of Friends of Phil Gramm, we make the following requests:

(1) As we discussed at the meeting, the completion of our review of the $337,327 transfer from the Committee to Re-Elect Phil Gramm (House committee) to Friends of Phil Gramm depends on our verification of your assertion that the contributions included in deposits dated between 2/14/83 and 2/18/83 were received prior to 2/12/83 (special election) and are therefore part of excess campaign funds. Any contributions comprising this surplus would not be subject to 441a(a) limitation considerations in our review. In order to verify this, we need to review the contributor checks from Account #00-04-292-7-00 deposited between 2/14/83 and 2/18/83 to determine if checks are dated prior to 2/12/83 as you have suggested.

As we discussed at the meeting, please inquire of the First City National Bank of Bryan whether photocopies of the above-mentioned checks are available. If available, determine whether feasible for copies to be made by the bank or whether copies can be made by the FEC auditors at the bank.

2004074100

(2) To complete the contributions review, the auditors need to locate contributor check copies for approximately 1200 donors. As we discussed at the meeting, the information needed to locate the check copies is contained in the data base, however, the printouts provided to date do not contain the information necessary to locate the check copies. The data needed is page 2 of the Contributions Inquiry program which lists date, check #, amount, election and batch # for each contribution received from a given donor. Please contact Mrs. Baxter to determine the optimal method of retrieving this information for the 1200 contributors. We can provide a listing of donor codes for which the page 2 information is being requested. A sample page is to be provided to the auditors to ensure the format meets specifications. If you determine that such an approach is unworkable, please contact us so we can implement one of the alternative procedures we discussed at the meeting.

(3) At the meeting, we presented you with a listing of expenditures made by Friends of Phil Gramm for refunds of contributions for which checks had not cleared during the audit period. In order to verify that these refund checks have since cleared the bank, we request that cancelled checks be provided for our review. Photocopies of the refund checks (front and back) would also be acceptable.

Thank you for your attention to the above request. If you have any questions, please contact Martin Favin or Thomas Nurthen of the Audit Division at 376-5320.

Sincerely,

Robert J. Costa
Assistant Staff Director
for the Audit Division

cc: James F. Schoener, Counsel

8904074401

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1837
Friends of Phil Gramm and	)	
John Baxter, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 13, 1986, the Commission decided by a vote of 5-0 to approve the subpoena and letter to the First City National Bank of Bryan, Texas, as recommended in the General Counsel's Report signed November 7, 1986.

Commissioners Aikens, Elliott, Josefiak, McGarry and Thomas voted affirmatively for this decision; Commissioner McDonald did not cast a vote.

Attest:

11-13-86
Date

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

Received in Office of Commission Secretary:	Mon.,	11-10-86,	10:50
Circulated on 48 hour tally basis:	MOn.,	11-10-86,	4:00
Deadline for vote:	Thurs.,	11-13-86,	4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 19, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mervin Peters, President
First City National Bank of Bryan, Texas
P.O. Drawer 913
Bryan, Texas 77805

RE: MUR 1837

Dear Mr. Peters:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you provide certain information has been issued. The Commission does not consider you a respondent in this matter; but rather a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. That section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena. However, you are required to submit the information under oath within fifteen days of your receipt of this subpoena.

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If you have any questions, please direct them to Patty Reilly, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Subpoena

cc: James Schoener, Esquire

8204074411'04

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 1837

SUBPOENA

TO: First City National Bank of Bryan, Texas

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas all checks composing deposits made between and including February 14, 1983 and February 18, 1983, into account # 00-04-292-7-00 (Committee to Re-Elect Phil Gramm).

Notice is given that these materials must be submitted to the Office of General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463 within 15 days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand in Washington, D.C. on this, 17th day of November 1986.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST:

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

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RCC# 2166

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005
TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

'86 DEC 4 A11:00

December 1, 1986

DEC 3 P4:29

Honorable Joan Aikens, Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 1837

Dear Chairman Aikens:

Recently your Commission authorized a subpoena of the records of the principal campaign committee of Senator Phil Gramm. This subpoena sought records of all checks deposited for the Committee to Re-Elect Phil Gramm from February 14, 1983 to February 18, 1983. These records had been requested by your audit staff in connection with the audit ordered by your Commission in early 1985. Since the Committee did not have such records (as indeed we are not required to keep), we suggested that if the Commission desired such records, we would be glad to order them but at the Commission's expense. We proposed that in the alternative, we would furnish an affidavit that the questioned deposits consisted of checks that were dated and received prior to the close of business on February 12, the date of the special election for which the donations were made.

We were shocked that your Commission, without the courtesy of a reply to those alternatives or any notice whatsoever, proceeded to issue a subpoena to the First City National Bank of Bryan, Texas, for those records. As you must know, the subpoena power is an extreme remedy which I believe Congress intended to be exercised with restraint and only when actually needed. Perhaps the Commission was not advised of our willingness to order such records but the only question was that of payment. I point out that the expenses incurred by this Committee to attempt total compliance with the F.E.C.A. has exceeded $250,000 and we have offered conciliation of the technical errors involved since the first response, yet the Commission continues to harass this Committee. I point out that 56 boxes of the Committee's records that were needed for "4 to 6 weeks" are still in your possession after what will be 5 months on December 1. With all these occurrences, is it any wonder that we are concerned about the treatment affording this Committee?

9204074106

I believe that the Commission abused its authority, either knowingly or unknowingly, in issuing a third party subpoena when those records could have been obtained by agreement. If the general counsel did not advise you of our willingness to order such records from the bank, I would suggest that in the future they be admonished to advise the Commission if records are available by agreement of counsel before any subpoena is issued. I am sure that the Commission must realize that a subpoena to a third party causes considerable unwarranted damage to the Committee.

We can only hope that no other respondents will be faced with this procedure of questionable standards in the future.

Respectfully submitted,

James F. Schoener

James F. Schoener
Attorney for Friends of Phil Gramm

bab

cc: Commissioners

9204074107

RECEIVED BY THE FEC
86 DEC 8 A10:09

DAVIS & DAVIS
ATTORNEYS AT LAW
A PARTNERSHIP INCLUDING
A PROFESSIONAL CORPORATION
3000 BRIARCREST DRIVE, SUITE 602
BRYAN, TEXAS 77802
(409) 776-9551

FREDERICK A. LARSON

12TH FLOOR
FIRST CITY PLAZA

86 DEC 9 A11:04

December 3, 1986

Federal Election Commission
Washington, D.C. 20463

Attention: Ms. Patty Reilly

Re: FCC Subpoena to First City National Bank of Bryan;
Your File Number MUR 1837

Dear Ms. Reilly:

This office represents First City National Bank of Bryan. Thank you for your assurance that the Commission would provide additional time for First City to respond to the Commission's subpoena of November 17, 1986. This is the written request for an extension of time which you asked me to submit.

The Bank has already begun its efforts to locate responsive materials. However, the Bank must satisfy itself before responding that it will not thereby violate Texas State or Federal laws protecting financing and banking privacy, for example, the Federal Right to Financial Privacy Act. Please be assured that First City intends fully and promptly to cooperate with the Commission within the bounds of applicable law.

Sincerely,

Frederick A. Larson

FAL:cdk

cc: Mr. Mervin D. Peters
President
First City National Bank of Bryan
P.O. Drawer 913
Bryan, Texas 77805-0913

Mr. Ken Telg
Senior Vice President and
Senior Operations Officer
First City National Bank of Bryan
P.O. Drawer 913
Bryan, Texas 77805-0913

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RECEIVED BY THE FEC
86 DEC 8 09:56

MUR 1837

DAVIS & DAVIS
ATTORNEYS AT LAW
A PARTNERSHIP INCLUDING
A PROFESSIONAL CORPORATION
3000 BRIARCREST DRIVE, SUITE 602
BRYAN, TEXAS 77802
(409) 776-9551

FREDERICK A. LARSON

SIXTH FLOOR
FIRST CITY PLAZA

December 4, 1986

86 DEC 8 AM 11:04

Federal Election Commission
Washington, D.C. 20463

Attention: Ms. Patty Reilly

Re: FEC subpena to First City National Bank of Bryan

Dear Ms. Reilly:

As you will recall, this office represents First City National Bank of Bryan. First City received a subpena from the Federal Election Commission (FEC) on November 24, 1986, in which the FEC requested access to the financial records of the Committee to Re-Elect Phil Gramm. According to the terms stated in the subpena, First City's response is due December 9, 1986. On First City's behalf, we requested an extension of time for First City's response. While we have not yet received your written confirmation that this extension has been granted, you have orally assured us that it will be. We appreciate this professional courtesy.

We have reviewed the law affecting First City's response to the subpena. As you know, the Right to Financial Privacy Act of 1978 (the Act) regulates the response of financial institutions to administrative subpenas. In general, the Act prohibits a financial institution such as First City from responding to such a subpena until the FEC has complied with the terms of the Act. In particular, 12 U.S.C. §3403(a) provides:

> No financial institution, or officer, employees, or agent of a financial institution, may provide to any Government authority access to or copies of, or the information contained in, the financial records of any customer except in accordance with the provisions of this chapter.

As we understand the facts of the present subpena, the FEC has not complied with the provisions of the Act, but, instead, has taken the position that the Act does not protect the financial privacy of corporations. We agree that the Act does not protect the privacy of corporations, and believe that the

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case law supports this contention, to-wit: Spa Flying Service, et al v. United States of America, et al, 724 F2d 95 (8th Circuit, 1984). However, after a search of its records, First City has been unable to locate documents which indicate that its customer, "Committee to Re-elect Phil Gramm", is, in fact, a corporation. Without further information in this regard, First City must assume that its customer is entitled to the protection of the Act.

Naturally, it is First City's policy to abide by applicable law without regard to the existence of enforcement mechanisms. However, the Act does provide substantial enforcement mechanisms: at 12 U.S.C. §3417(a), the Act provides that statutory, actual and punitive damages, enforcement costs and attorney's fees may all be assessed against First City if it should improperly comply with the FEC's subpena. For these several reasons, First City hereby requests that the FEC provide formal written certification that in issuing the subpena to First City the FEC has complied with the requirements of the Right to Financial Privacy Act. At 12 U.S.C. §3403(b), the Act authorizes the FEC to provide such a certificate. The certificate presents First City with assurance that it has acted properly with regard to its customer and provides a defense to an allegation of improper compliance with the FEC's subpena.

As an alternative presented by the Act, First City will accept a written authorization to release the documents made by its customer in compliance with 12 U.S.C. §3404(a).

Please be assured that First City intends to comply with the subpena immediately upon receipt of the FEC's certification under the Act, and stands ready to assist the Commission in every way mandated by applicable law. Do not hesitate to contact this office if you require further information or assistance.

Sincerely,

FREDERICK A. LARSON

FREDERICK A. LARSON

FAL/bp

cc: Mr. Mervin Peters
Mr. Kenneth Telg

plum

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 17, 1986

James F. Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street N.W.
Washington, D.C. 20005

Re: MUR 1837
The Friends of Phil Gramm and
John Baxter, as treasurer

Dear Mr. Schoener:

This is to confirm your December 8, 1986, telephone conversation with Patty Reilly of this Office. Ms. Reilly informed you that the First City National Bank of Bryan, Texas, would not comply with the Commission's November 13, 1986, subpoena unless the Commission furnishes a Certificate of Compliance with the Right to Financial Privacy Act, 12 U.S.C. § 3401 et. seq. Alternatively, the First City National Bank has stated it will comply with the subpoena in the event the Committee to Re-elect Phil Gramm furnishes it with an authorization pursuant to 12 U.S.C. § 3404(a).

As Ms. Reilly stated, it is our position that political committees are not "persons" as defined at 12 U.S.C. § 3401(4) and thus, the Committe to Re-Elect Phil Gramm is not covered by the provisions of the Right to Financial Privacy Act. We are confident that a court would uphold this position. Nevertheless, in light of your expressed willingness to assist the Commission in obtaining the records from the bank, and in order to complete the audit as expeditiously as possible, we are requesting that you provide the Commission and the Bank with an affidavit containing the material provided at 12 U.S.C. § 3404(a).

If you have any questions please contact Patty Reilly at 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

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pkm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 17, 1986

Fredrick A. Larson, Esquire
Davis & Davis, P.C.
3000 Braircrest Drive, Suite 602
Bryan, Texas 77802

Re: MUR 1837

Dear Mr. Larson:

The Office of the General Counsel is in receipt of your December 3, 1986 request for an extension of time in which to respond to the Commission's subpoena. Additionally, we have also received your December 4, 1986 letter that states your client will not furnish the Commission with the subpoenaed materials unless the Commission either provides a formal written certification of compliance with the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., or obtains a written authorization from the Committee to Re-elect Phil Gramm.

It is our position that because the Committee to Re-elect Phil Gramm is neither an individual nor a partnership of five or more persons, it is not a "person" as defined at 12 U.S.C. § 3401(4) and thus does not come within the provisions of the Right to Financial Privacy Act. We are confident that a court would uphold this position. Nevertheless, in order to resolve this matter as expeditiously as possible, we are communicating with counsel for the Committee to Re-elect Phil Gramm to ascertain whether they will provide the requested written authorization. Accordingly, this Office will not seek authorization to enforce this subpoena until we have a response from the Committee's counsel. At that time we will notify you of the status of the matter.

If you have any questions please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

2204074411 2

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1862-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

RECEIVED AT THE FEC
GCC#2359
86 DEC 29 A8:54

MUR1837

JAMES F. SCHOENER
(202) 789-8643

December 23, 1986

86 DEC 29 A11:00
RECEIVED
GENERAL COUNSEL

Mr. John Baxter, Treasurer
2355 Semmons Freeway
Suite 503
Dallas, Texas 75207

Re: F.E.C. Audit

Dear John:

Enclosed please find an authorization to First City Bank to disclose the contribution checks from February 14 to February 18, 1983. These are in connection with the audit the F.E.C. is still pursuing. I believe the authorization is self-explanatory.

After signing, please send the authorization to the bank and send the F.E.C. and me a copy of your letter of transmission as well as a copy of the authorization. If you have any questions, please call.

Very truly yours,

Jim

James F. Schoener

bab

Enclosure

cc: Ruth Cymber
General Counsel, F.E.C.

9220740113

FIRST CITY NATIONAL BANK

BRYAN, TEXAS

Authorization to Disclose

Committee to Re-Elect Phil Gramm does hereby authorize you to disclose to the Federal Election Commission the checks deposited in our account in your bank from February 14, 1983 through and including February 18th, 1983. Any such information furnished should be at the cost and expense of the Federal Election Commission and we request a report of the summary of the materials furnished. This disclosure is authorized under 12 U.S.C. § 3404(a) and in accordance with the terms of that provision this authorization shall exist for a period of three months from date hereof, may be revoked at any time before the records are disclosed and these records are to be used by the said Commission in connection with an audit of the Friends of Phil Gramm.

If there is any question concerning this authorization, you may contact the committee's attorney, James F. Schoener, 1015 Fifteenth Street, N.W., Suite 1200, Washington, D.C. 20005, telephone (202) 789-8640.

Committee to Re-Elect Phil Gramm
Friends of Phil Gramm

Dated: _____ 198__

by _____
John Baxter, Treasurer

9204074911-4

GCC# 2429
RECEIVED AT THE FEC

87 JAN 8 AM : 18

MC1R1837

Phil Gramm
United States Senator

January 2, 1987

First City National Bank
P. O. Drawer 913
Bryan, Texas 77805

Gentlemen:

Enclosed is an Authorization to Disclose information on the Friends of Phil Gramm bank account to the Federal Election Commission.

If you have any questions, please contact our counsel, James F. Schoener, at the address and telephone number indicated on the authorization.

Very truly yours,

John P. Baxter
Treasurer

JPB:dm
Enclosure

cc: James F. Schoener
Ruth Cymber
General Counsel, F.E.C.

87 JAN 8 P3:31

8220744113

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds
to re-elect Phil Gramm to the United States Senate

RECEIVED AT THE FEC
GCC#2367
86DEC29 A9:40

DAVIS & DAVIS
ATTORNEYS AT LAW
A PARTNERSHIP INCLUDING
A PROFESSIONAL CORPORATION
3000 BRIARCREST DRIVE, SUITE 602
BRYAN, TEXAS 77802
(409) 776-9551

FREDERICK A. LARSON

SIXTH FLOOR
FIRST CITY PLAZA

December 22, 1986

86DEC29 A10:56

Mr. Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

Ms. Patty Reilly
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1837

Dear Mr. Noble and Ms. Reilly:

Thank you for your letter of December 17, 1986, clarifying the Commission's position concerning the subpena served on First City. I have spoken with Ms. Reilly by telephone, and she explained to me that the Commission's statement that it will "not seek authorization to enforce" the subpena at this time constitutes the promised extension of time during which First City may timely respond to the subpena.

We do understand that the Commission contends that First City's customer, the Committee to Re-elect Phil Gramm, is not a "person" within the meaning of the Right to Financial Privacy Act of 1978. First City makes no contrary assertion. As stated in our letter of December 4, First City lacks sufficient information concerning the form of organization of its customer to make such a determination. If the Commission can provide First City with documentation which clearly establishes the form of organization of the Committee to Re-elect Phil Gramm, this may resolve the problem.

First City is obliged by the Act to preserve its customer's privacy or risk substantial penalties. Having seen no evidence which directs a contrary conclusion, First City must continue to assume that its client enjoys the protection

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of the Act. Accordingly, we applaud the Commission's efforts to provide First City with a 12 U.S.C. § 3414 document release authorization which complies with the dictates of the Act.

Sincerely,

Frederick A. Larson

FAL:cdk

cc: Mr. Mervin Peters
President
First City National Bank of Bryan
P.O. Drawer 913
Bryan, Texas 77805-0913

Mr. Ken Telg
Senior Vice President
First City National Bank of Bryan
P.O. Drawer 913
Bryan, Texas 77805-0913

3204074117

MUR1837

FIRST CITY NATIONAL BANK

BRYAN, TEXAS

Authorization to Disclose

Committee to Re-Elect Phil Gramm does hereby authorize you to disclose to the Federal Election Commission the checks deposited in our account in your bank from February 14, 1983 through and including February 18th, 1983. Any such information furnished should be at the cost and expense of the Federal Election Commission and we request a report of the summary of the materials furnished. This disclosure is authorized under 12 U.S.C. § 3404(a) and in accordance with the terms of that provision this authorization shall exist for a period of three months from date hereof, may be revoked at any time before the records are disclosed and these records are to be used by the said Commission in connection with an audit of the Friends of Phil Gramm.

If there is any question concerning this authorization, you may contact the committee's attorney, James F. Schoener, 1015 Fifteenth Street, N.W., Suite 1200, Washington, D.C. 20005, telephone (202) 789-8640.

Committee to Re-Elect Phil Gramm
Friends of Phil Gramm

Dated: December 19 1986

by John Baxter
John Baxter, Treasurer

8904074118

GGC# 2461
RECEIVED AT THE FEC

First City National Bank
3000 Briarcrest Drive / P. O. Drawer 913
Bryan, TX 77805-0913
(409) 776-5402

87 JAN12 P1:15

January 9, 1987

FIRSTCITY

87 JAN 12 P4:29

Mr. Lawrence M. Noble
Deputy General Council
Federal Election Commission
Washington, D.C. 20463

Re: MUR1837

Dear Mr. Noble:

We are placing in the mail today documents requested by the Federal Election Commission concerning certain financial records of one of our customer's accounts, the Committee to Reelect Phil Gramm. This subpoena was originally received by us on November 24, 1986 and, as you are well aware, a time extension was subsequently granted by your office.

The items being sent to you are photocopies of all checks deposited by the Committee to Reelect Phil Gramm account between February 14, 1983 and February 18, 1983. Also included are photocopies of the deposit slips for those same items. This represents a large number of items and it required approximately 32 man hours to produce the items requested in the subpoena. In accordance with 12 U.S.C. 3415 I am requesting that you reimburse us for the cost we incurred in searching for, reproducing, and transporting the requested items to your office. Attached you will find an invoice dated December 23, 1986 itemizing our cost in searching for and reproducing the requested items. That cost, as evident by the invoice, is $724.00. In addition, the cost of mailing those items to your office is $12.54 so I am officially requesting total reimbursement of $736.54. Please make a check for that amount payable to First City National Bank and direct it to my attention.

Sincerely,

Kenneth A. Telg
Senior Vice President
Senior Operations Officer

KAT:bi

Enclosure

cc: James F. Schoener
Fredrick A. Larson

9904074419

First City National Bank
3000 Briarcrest Drive / P.O. Drawer 913
Bryan, TX 77805-0913
(409) 779-5402

December 23, 1986

FIRSTCITY

Federal Election Commission
Washington, D C 20463

Re: Subpoena to First City National Bank on the account titled Committe to Re-elect Phil Gramm 0042927-01.

The cost involved in preparing the research on the requested deposits is as follows:

1. Preparation of 8 detail deposits (debits and credits): 8 @ 4 hours each, $20.00/hr. research fee = 640.00

2. Materials used for research: 1.5 rolls of paper, dry silver process, $56.00/roll = 84.00.

Total Research costs for the above subpoena are: $724.00.

Please make check payable to First City National Bank. If there are any questions, please feel free to call.

Sincerely,

Sabrina Saladino

Sabrina M. Saladino
Assistant Vice President
Account Services

8 3 0 4 0 7 4 4 1 2 0

CCC# 2501
RECEIVED AT THE FEC

87 JAN 16 A9:09

LAW OFFICES
McGUINESS & WILLIAMS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N. W.
WASHINGTON, D. C. 20005

202 789-8600

JAMES F. SCHOENER
202 789-8644

JAN 16 A10:23

January 13, 1987

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

Re: Friends of Phil Gramm

Dear Sir:

Enclosed please find two copies of solicitations that have recently been made in connection with my client, Friends of Phil Gramm. Attachment 1 sought "Annual Dues" in an apparent amount of $50,000. Obviously this was an error, and immediately upon discovering the error, a correction was undertaken. Attachment 2 is a letter which corrected the computer malfunction that caused the problem.

No contributions of such an excessive amount were received and we do not expect any. If such a contribution was received, we, of course, would return the same.

This letter is for information purposes and to avoid a MUR or pre-MUR because of this problem. If there is any question, please contact me at 789-8640.

Very truly yours,

James F. Schoener

James F. Schoener

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Enclosure

Attachment 1

1987 MEMBERSHIP 1987

THIS IS YOUR OFFICIAL MEMBERSHIP CARD

GRAMM SENATE CLUB
1987

WASHINGTON, DC 20003

Common Sense & Uncommon Courage

GRAMM SENATE CLUB

P. O. Box 10108
Dallas, Texas 75207

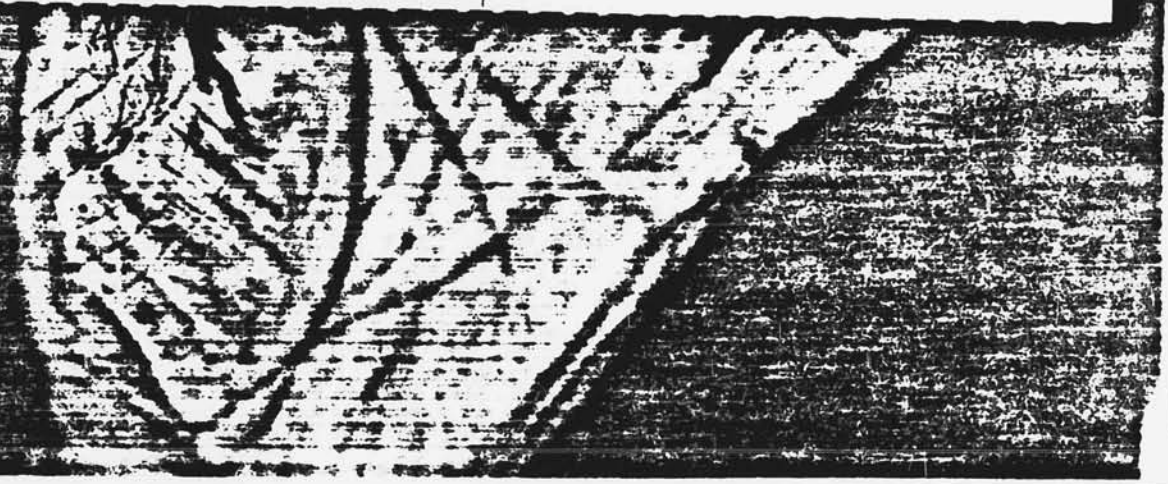
Annual Dues $50000 ☐ $_____

Please make check payable to:
FRIENDS OF PHIL GRAMM

Please return this portion with contribution

Received from:

Paid for by Friends of Phil Gramm



Attachment 2

CSI
communication specialists, inc.

January 12, 1987

Dear Friends of Senator Gramm:

I must apologize to you for a mistake that was made on a project we did for Senator Phil Gramm.

Halfway through the mailing our computer malfunctioned in printing the gift amount on the pledge card.

If the pledge card you received did not have your previous gift total correctly identified, please disregard that card and substitute the one we have enclosed.

Again please accept my apology. I hope this has not caused you any inconvenience.

Sincerely,

John H. Gray, Jr.
President

P.S. Since this mistake occurred because of a malfunction in our computer, all costs for the materials and mailing this notice are being paid by my company.

one red river
p.o. box 1829
austin, texas 78767
(512) 478-3448

XEROX TELECOPIER 295 : 11-11-11:11:11 11:
FM-6 →

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

With regard to the 56 boxes of documents subpoenaed from the Friends of Phil Gramm and shipped from Dallas, Texas on June 25, 1986, and arrived in Washington, D. C. on July 1, 1986, we hereby certify:

1) These boxes were sealed in our presence using the same inventory used by the parties when the boxes were shipped from Texas and received in Washington, D. C. (copy attached)

2) The boxes will be shipped to Dallas via United Parcel Service at Commission risk and expense to the following address provided by the Committee:

John P Baxter, treasurer; Friends of Phil Gramm
2355 Stemmons Freeway
Suite 503
Dallas, Texas 75207

For the Federal Election Commission

2/14/87
Date

Patty Reilly
Patty Reilly

For the Friends of Phil Gramm

James F. Schoener
James F. Schoener

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Federal Election Commission
(8/77)

	BOX #	CONTENTS	WEIGHT per BOX	COST
1	1 ✓	CC 6-9-83-01 - 10-31-83-2		
2	2 ✓	CC 11-1-83 - 12-5-83 11		
3	3 ✓	CC		
4	4 ✓	CC		
5	5 ✓	CC		
6	6 ✓	CC		
7	7 ✓	CC		
8	8 ✓	CC		
9	9 ✓	CC		
10	10 ✓	CC		
11	11 ✓	CC		
12	12 ✓	CC		
13	13 ✓	CC		
14	14 ✓	CC		
15	15 ✓	CC		
16	16 ✓	CC		
17	17 ✓	CC		
18	18 ✓	CC		
19	19 ✓	CC		
20	20 ✓	CC		
21	21 ✓	CC		
22	22 ✓	CC		
23	23 ✓	CC		
24	24 ✓	CC		
25	25 ✓	CC		
26	26 ✓	CC		
27	27 ✓	CC		
28	28 ✓	CC		
29	29 ✓	CC		
30	30 ✓	CC		
31	31 ✓	CC		
32	32 ✓	CC		
33	33 ✓	CC		
34	34 ✓	CC		
35	35 ✓	Phone Bill invoices, other invoices		
36				
37				
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7-1-86

GPO 912-045

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Federal Election Commission
(8/77)

				1	2	3
1	36 ✓	RD	182-189	✗	✓	
2	37 ✓	RD	173 181	✗	✓	
3	38 ✓	Cmte Inv.		✗	✓	
4	39 ✓	Cmte Inv		✗	✓	
5	40 ✓	Cmte Inv.		✗	✓	
6	41 ✓	Cmte Inv.		✗	✓	
7	42 ✓	Cmte Inv.		✗	✓	
8	43 ✓	Cmte Inv		✗	✓	
9	44 ✓			✗	✓	
10	45 ✓	RD	101-109	✗	✓	
11	46 ✓	Cmte Inv		✗	✓	
12	47 ✓	RD	110-118	✗	✓	
13	48 ✓	RD	119-127	✗	✓	
14	49 ✓	RD	128-136	✗	✓	
15	50 ✓	Cmte Inv.		✗	✓	
16	51 ✓	Cmte Inv.		✗	✓	
17	52 ✓	Cmte Inv.		✗	✓	
18	53 ✓	RD	137-145	✗	✓	
19	54 ✓	RD	146-154	✗	✓	
20	55 ✓	RD	155-163	✗	✓	
21	56 ✓	RD	164-[redacted] 172	✗	✓	
22	[redacted]					
23						
24	[signature]					
25						
26						
27						
28	Above boxes turned over to					
29	FEC auditors 6/25/86					
30	Martin Favin					
31						
32						
33	[illegible]					
34	on 19 [illegible] 1987					
35	[illegible]					
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39						
40	[illegible]					
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GPO 818-648

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Friends of Phil Gramm and John Baxter, as treasurer	)	MUR 1837
	)	

COMPREHENSIVE INVESTIGATIVE REPORT #3

I. BACKGROUND

This matter arose from a complaint filed on October 31, 1984, by Ms. Donna Mobley of Austin, Texas, against The Friends of Phil Gramm, and John Baxter, as treasurer ("the Committee") and 170 other persons. On March 5, 1985, the Commission found reason to believe the Committee violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), 434(b)(3)(A), as well as 11 C.F.R. § 102.17. The Commission also authorized on audit of the Committee pursuant to 2 U.S.C. § 437g(a)(2).

Following the Committee's refusal to produce its records voluntarily, the Commission issued a subpoena for documents on June 20, 1985. After denying respondents' motion to quash this subpoena, the Commission authorized the Office of the General Counsel to file a petition for subpoena enforcement in Dallas, Texas. At an October 31, 1985, show cause hearing, the parties tentatively agreed on the scope of this subpoena, and this Office was directed to write an order for the parties' stipulation. When negotiations regarding this order reached an impasse, the parties each submitted proposed orders. On January 16, 1986, the court enforced the Commission's order, with minor modifications.

87 MAR 4 P3:45

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The audit commenced on February 19, 1986, in Dallas, Texas. It soon became apparent that completing the audit in Texas would be too time consuming and expensive considering the budget constraints facing the Commission. Accordingly, the auditors and the Office of the General Counsel asked the respondents to permit the relocation of the audit site to Washington, D.C. After the respondents refused to agree to this relocation, the Commission authorized this Office to seek judical assistance in relocating the audit site. The respondents then submitted a series of conditions under which they would agree to relocation. On April 29, 1986, the Commission determined not to agree to these conditions. The Office of the General Counsel then returned to court.

On May 16, 1986, the court granted the Commission's Motion to Clarify, subject to four conditions. The last of these conditions was "that an agreed inventory of the removed records be provided." The respondents interpreted this provision to require a piece by piece inventory of over 500,000 documents to be conducted jointly by the Commission and respondents. This procedure would be more expensive and time consuming than the audit itself, and therefore counter productive to the court's order permitting removal of the records. This Office, therefore, suggested that if respondents wanted to conduct such a detailed inventory they should go ahead, and when it was completed the Commission's auditors would spot-check the inventory for

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accuracy. Alternatively, this Office suggested utilizing an inventory provided by the Commission's auditors and signed by the Committee's representatives when the records were returned to the Committee on April 10, 1986. Additionally, the Office of the General Counsel agreed to entertain all reasonable proposals by the respondents to meet the court's inventory requirement.

When agreement could not be reached on the inventory requirement, on June 12, 1986, the Office of the General Counsel filed additional papers with the District Court in Texas seeking further clarification of the court's joint inventory requirement. On that date, following notification to respondents' counsel of the mailing of the court papers, counsel agreed to "waive any joint inventory," provided the Commission is responsible for lost documents. On June 13, 1986, in a letter to counsel, this Office indicated that the Commission would take responsibility for any documents lost while in its possession, and requested the Committee to make the subpoenaed materials available to the Commission's auditors in Dallas to be verified using the April 10, 1986, inventory. Following counsel's oral agreement to this request, this Office withdrew its court papers and so informed counsel. On June 25, 1986, a member of the audit staff traveled to Texas, obtained and verified the subpoenaed materials, and arranged to ship them to the Commission's Offices. On July 1, 1986, these boxes were opened in the presence of the Committee's representatives and verified using the April 10, 1986, inventory.

9204074129

The Commission issued a further subpoena in this matter in December 1986 in order to obtain copies of checks to verify the composition of funds transferred to the Friends of Phil Gramm from the Senator's House Committee. Pursuant to an agreement of the parties, the First City National Bank of Bryant, Texas, voluntarily provided these materials to the Commission after receiving a waiver from the Committee. These additional bank records were received by the Commission on January 13, 1987. On February 19, 1987, the Committee's records were sealed in the presence of the Committee's representative and prepared for shipment to Dallas, Texas.

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II. COMPLETION OF THE SECTION 437g(a)(2) AUDIT

On February 9, 1987, the Audit Division provided the Office of the General Counsel with a lengthy memorandum discussing the completed Audit findings as well as numerous attachments and background documents.

This Office is currently reviewing the memorandum, attachments, and the background materials. An initial review appears to reveal possible new violations. After fully reviewing all documents and materials, this Office will report to the Commission with appropriate recommendations.

Charles N. Steele
General Counsel

3/4/87
Date

BY: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: MARCH 6, 1987

SUBJECT: MUR 1837 - COMPREHENSIVE INVESTIGATIVE REPORT #3
SIGNED MARCH 4, 1987

The above-captioned matter was received in the Office of the Secretary of the Commission Wednesday, March 4, 1987 at 3:45 P.M. and circulated to the Commission on a 24-hour no-objection basis Thursday, March 5, 1987 at 11:00 A.M.

There were no objections received in the Office of the Secretary of the Commission to the Comprehensive Investigative Report #3 at the time of the deadline.

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plm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 4, 1987

James F. Schoener, Esquire
McGuiness & Williams
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

Re: MUR 1837
Friends of Phil Gramm and
John Baxter, as treasurer

Dear Mr. Schoener:

This is to confirm your conversation with Patty Reilly of this Office on February 19, 1987, regarding the return of records to your clients in the above-captioned matter. On that date, Ms. Reilly, Mr. Favin of the Commission's audit staff, and you verified the 56 boxes of subpoenaed records using the April 10, 1986, inventory. This inventory was signed by you as a certification that the Commission was returning 56 boxes of records.

Pursuant to our agreement, the audit staff shipped these records on March 3, 1987, to the Committee's treasurer, Mr. John Baxter, at 2355 Semmans Freeway, Suite 503, Dallas, Texas, 75207 via United Parcel Service. This shipment was made at the Commission's risk and expense. We are informed the shipping time is five working days from the date the boxes were picked up by United Parcel Service.

Thank you for your cooperation in returning these records. If you have any questions please contact Patty Reilly, the attorney assigned to this matter, at 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 4, 1987

Fredrick A. Larson, Esquire
c/o First City National Bank
of Bryan, Texas
P.O. Box Drawer 913
Bryan, Texas 77805

Re: MUR 1837

Dear Mr. Larson:

Enclosed please find the records of the Committee to Re-elect Phil Gramm that your clients furnished to the Commission pursuant to an authorization under 12 U.S.C. § 3404(a).

Thank you for your cooperation on this matter.

Sincerely,

Charles N. Steele
General Counsel

Lois G. Lerner
Associate General Counsel

Enclosures

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Friends of Phil Gramm and) MUR 1837
John Baxter, as treasurer)

GENERAL COUNSEL'S REPORT

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This matter arose from a complaint filed on October 30, 1984, by Ms. Donna Mobley of Austin, Texas, against The Friends of Phil Gramm, and John Baxter, as treasurer ("the Committee") and 170 other persons. On March 5, 1985, the Commission found reason to believe the Committee violated 2 U.S.C.§§ 434(b)(8), 434(b)(5)(A), 441a(f), 434(b)(3)(A), as well as, 11 C.F.R. § 102.17. Additionally, on that date, the Commission found no reason to believe the Committee violated 2 U.S.C. §§ 441b and 441f in connection with the possible acceptance of a corporate contribution made in the name of another.[1/] The Commission also authorized an audit of the Committee pursuant to 2 U.S.C. § 437g(a)(2), and denied the Committee's request for pre-probable cause conciliation at that time in order to complete its investigation. On February 9, 1987, the Audit Division provided the Office of the General Counsel with a memorandum discussing the audit findings.

1/ The Commission also found no reason to believe 32 respondents violated 2 U.S.C. §§ 441a(a)(1)(A) or 441a(a)(1)(C), and took no further action with respect to the other respondents, except for a recommendation concerning M.N. Bostick for a violation of 2 U.S.C. § 441f. This latter finding resulted in two pre-probable cause conciliation agreements regarding Mr. Bostick and KWTX Corporation. All respondents were respectively notified of the Commission's determinations relating to them.

This report is divided into three sections. First, we discuss in detail the background of this matter. Second, we analyze the audit report and make additional recommendations. Finally, we address the Committee's previous request for pre-probable cause conciliation.[2/]

I. BACKGROUND

As previously noted, the complaint in this matter was filed on October 31, 1984, and an expedited report was sent to the Commission on November 4, 1984. On November 9, 1984, the Committee filed an initial response in the form of a motion, requesting that individual respondents be permitted to avoid responding. The Commission denied this motion on November 27, 1984.

Following the receipt of responses from individuals and the Committee, on March 5, 1985, the Commission made the previously-noted reason to believe and no reason to believe determinations. On March 27, 1985, the Committee filed a response to the General Counsel's Factual and Legal Analysis,[3/] and on May 6, 1985, filed a "Motion for Reconsideration of the Commission's Actions of March 5, 1985." The former took issue with factual issues; the

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[2/] At a February 19, 1987, meeting between staff and respondents' counsel, the Committee was informed that its pre-probable cause request is still considered outstanding. Counsel restated the Committee's desire for pre-probable cause conciliation.

[3/] A Factual and Legal Analysis was provided to the Committee because some of the reason to believe recommendations were internally generated.

latter argued that the Commission's audit was time barred; that the Commission must grant respondents' request for pre-probable cause conciliation; and that the reason to believe determinations extended beyond the allegations contained in the complaint. The Commission considered these arguments and on May 24, 1985, denied this Motion for Reconsideration and so notified the Committee on May 29, 1985. Prior to this notification, on May 24, 1985, the Committee's counsel informed this Office that his clients would not make the audit materials available until the Commission responded to its Motion for Reconsideration.

On June 5, 1985, the Committee requested a three week extension of time for the initiation of the audit. Upon considering that request, the Commission, on June 12, 1985, granted a two week extension and authorized a subpoena for documents to be used in the event the Committee did not make the documents available to the Commission's auditors.

Subsequently, on June 19, 1985, the Committee filed suit against the Commission in the Northern District of Texas, Dallas Division. The complaint sought a preliminary injunction; declaratory relief on the basis that the Commission's audit was time barred;[4/] alleged various constitutional injuries; and sued the Commissioners in their official and individual capacities.

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4/ A formal ruling on the preliminary injuction was not issued. Rather, the parties and the court held a conference call where the court determined to "hold matters in abeyence" until the Commission filed a subpoena enforcement action and the judge returned from a long-planned month's vacation.

In response to the suit, and upon assurances of counsel that the records would not be produced at the conclusion of the extension of time, the Office of the General Counsel served the subpoena for records on June 20, 1985. Respondents then filed a motion to quash this subpoena which the Commission denied on June 26, 1985. Also on that date, the Commission authorized the Office of the General Counsel to file a subpoena enforcement action. This action was filed on August 5, 1985.

During the month of July, 1985, the Committee served on the Office of the General Counsel a broad request for production of documents and two detailed sets of interrogatories. On August 5, 1985, the Commission filed a Motion to Stay Discovery which the court granted on August 14, 1985. Prior to the October court date, the Committee filed a number of substantive motions requiring a Commission response.

At an October 7, 1985, hearing in Dallas, Texas, the court dismissed the suit filed by the Committee. The court ordered another evidentiary hearing in order to examine the scope of the Commission's subpoena. At an October 31, 1985, hearing the parties tentatively agreed on the scope of the subpoena, and this Office was directed to write an order for the parties' stipulation. When negotiations regarding this order reached an impasse, each party submitted a proposed order. On January 6, 1986, the Court enforced the Commission's order with minor modifications.

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The audit commenced on February 19, 1986, in Dallas, Texas. It soon became apparent that completing the audit in Texas would be too time consuming and expensive considering the budget constraints facing the federal government at that time. Accordingly, the auditors and the Office of the General Counsel asked the respondents to permit the relocation of the audit site to Washington, D.C. After the respondents refused to agree to this relocation, the Commission authorized this Office to seek judicial assistance in relocating the audit site. On April 10, 1986, the auditors returned the records to the Committee pending an agreement concerning the relocation of the audit site. The respondents then submitted a series of conditions under which they would agree to relocation. On April 29, 1986, the Commission determined not to agree to these conditions. The Office of the General Counsel then returned to court to seek clarification of the court's order enforcing the subpoena.

On May 16, 1986, the court granted the Commission's Motion to Clarify, subject to four conditions. The parties agreed on the meaning of the first three of these conditions. The last of these conditions was "that an agreed inventory of the removed records be provided." The respondents interpreted this provision to require a piece by piece inventory of over 500,000 documents to be conducted jointly by the Commission and respondents. This procedure would have been more expensive and time-consuming than the audit itself, and therefore counter-productive to the court's order permitting removal of the records. This Office, therefore, suggested that if respondents wanted to conduct such a detailed

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inventory they should go ahead, and when it was completed the Commission's auditors would spot-check the inventory for accuracy. Alternatively, this Office suggested utilizing an inventory already provided by the Commission's auditors and signed by the Committee's representatives when the records were returned to the Committee on April 10, 1986. Additionally, the Office of the General Counsel agreed to entertain all reasonable proposals by the respondents to meet the court's inventory requirement.

When agreement could not be reached on the inventory requirement, on June 12, 1986, the Office of the General Counsel filed additional papers with the District Court in Texas seeking further clarification of the court's joint inventory requirement. On that date, following notification to respondents' counsel of the mailing of the court papers, counsel agreed to "waive any joint inventory," provided the Commission would be responsible for lost documents. On June 13, 1986, in a letter to counsel, this Office indicated that the Commission would take responsibility for any documents lost while in its possession, and requested the Committee to make the subpoenaed materials available to the Commission's auditors in Dallas with verification to be based on the April 10, 1986, inventory. Following counsel's oral agreement to this request, this Office withdrew its court papers and so informed counsel. On June 25, 1986, a member of the audit staff traveled to Texas, obtained and verified the subpoenaed materials, and arranged to ship them to

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the Commission's Offices. On July 1, 1986, these boxes were opened in the presence of the Committee's representatives and verified using the April 10, 1986, inventory.

The Commission issued a further subpoena in this matter in December, 1986, in order to obtain copies of checks in order to verify the composition of funds transferred to the Friends of Phil Gramm from the Senator's House Committee. Pursuant to an agreement of the parties, the First City National Bank of Bryan, Texas, voluntarily provided these materials to the Commission after receiving a waiver from the Committee. These additional records were received by the Commission on January 13, 1987. On February 19, 1987, the Committee's records were sealed in the presence of the Committee's representative and prepared for shipment to Dallas, Texas. On February 9, 1987, the Audit Division provided the Office of the General Counsel with a lengthy memorandum detailing the Audit findings which is attached to this report. (Attachment 1) These findings are discussed below in their order of appearance in the Audit Memorandum.

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II. AUDIT MEMORANDUM AND RECOMMENDATIONS

A. Excessive Contributions

The Commission found reason to believe that the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441a(f) by both accepting facially excessive contributions and by improperly designating contributions.

Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate or his authorized committee with

respect to any election for federal office which, in the aggregate, exceed $1,000. Contributors may designate contributions for a particular election, but a contribution made after a primary election may only be designated for the primary election provided the committee has a primary debt. 11 C.F.R. § 110.1(a)(2)(i).5/ When a contribution is not designated in writing for a particular election, and is made prior to the primary, such contribution is a primary contribution. Similarily, if such an undesignated contribution is made after the primary, such contribution is a general election contribution. 11 C.F.R. § 110.1(a)(2)(ii)(A) and (B). A contribution which represents contributions by more than one person shall indicate on the written instrument, or on an accompanying written statement signed by all contributors, the amount to be attributed to each contributor. 11 C.F.R. § 104.8(d). Contributions made by a married individual shall not be attributable to that individual's spouse, unless otherwise

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5/ New regulations governing contribution limitations and prohibitions, and contributions by persons and multicandidate committees went into effect on April 8, 1987. This report cites to the regulations in effect at the time the transactions at issue took place. The new regulations at 11 C.F.R. 110.1 permit redesignation and reattribution of excessive contributions if a committee obtains such redesignation or reattribution within 60 days after the excessive contribution is received. Of the 874 excessive contributions identified in this matter, approximately 16 remained outstanding for less than 60 days.

specified by the individual or that individual's spouse. 11 C.F.R. § 100.7(c). Political committees are prohibited from accepting contributions exceeding the Act's limitations. 2 U.S.C. § 441a(f).

In the instant case, the auditor's review reveals 874 excessive contributions totalling $690,999.05. The names of these contributors are listed in the Audit Memorandum at Attachments C and D. 6/ These excessives are divided into three main categories. First, the auditors noted excessive contributions resulting from inadequate documentation of election designations. Such contributions are marked with an "A" on the attachments. Second, the auditors determined other contributions to be excessive because the Committee failed to obtain the signature of a purported contributor. Such contributions are marked with a "B" on the attachments. Finally, other excessive contributions made by agents are noted with a "C" on the attachments. Some excessive contributions could not be attributed to any one of these codes; some excessives could be attributed to more than one code.

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6/ The auditors used a 30 day threshold period running from the date of deposit in order to determine excessive contributions. Contributions refunded during that period were not included in this amount. Additionally, the Committee sent confirmation requests to contributors on May 29, 1985, in order to document the attribution of certain contributions to spouses or the reattribution of contributions to another election. See Attachment A. The Committee also sent confirmation requests to reattribute other contributions to the 1990 election. See Attachment B. As previously noted at footnote 5, the vast majority of these resdesignations and reattributions would not have been timely made under the new regulations at 11 C.F.R. § 110.1.

In light of the foregoing, it appears that the Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions. Because the Commission has already made a reason to believe determination regarding this statutory provision, no additional reason to believe finding is necessary. The Committee, however, will be notified of the amount determined to be excessive.

B. Other Excessive Contributions

During the auditors' review for possible excessive contributions, 15 checks or money orders totalling $33,800 were discovered to be signed by only one individual, but nevertheless attributed by the Committee wholly, or in part, to persons other than the person signing either the instrument or accompanying documentation. Six of these were annotated as attributable to the drawer of the instrument and other individuals. Nine were written instruments annotated as attributable to other individuals and not to the drawer at all. A listing of these instruments and the attributions made by the Committee are included in the Audit Report at Attachment E. The total attributed to persons other than the drawer is $21,550. All but three of these contributions were included with the other excessive contributions.

The Audit Memorandum identifies these contributions as possible violations of 2 U.S.C. § 441f. This section provides

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that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution. Additionally, it provides that no person shall knowingly accept a contribution made by one person in the name of another person. Id. The Commission's Regulations provide that a contribution representing contributions by more than one person shall indicate on the written instrument, or on an accompanying written statement signed by all contributors, the amount to be attributed to each contributor. 11 C.F.R. § 104.8(d). Moreover, contributions made by a married individual shall not be attributable to that individual's spouse, unless otherwise specified by the individual or that individual's spouse. 11 C.F.R. § 100.7(c).

In the instant case, it appears the Committee attributed contributions to certain individuals without receiving the required signed documentation. Therefore, the entire amounts of the checks and money orders must be attributed only to the persons signing them. The auditors did attribute these contributions to the signers of the checks and money orders and, where appropriate, these individuals were included in the list of other excessive contributors.

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C. Failure to Report Outstanding Debts and Obligations

The Commission found reason to believe the Committee violated 2 U.S.C. § 434(b)(8) by failing to report its outstanding debts and obligations.[7/] The Act requires each report filed by the treasurer of a political committee to disclose the amount and nature of outstanding debts and obligations owed by the committee. 2 U.S.C. § 434(b)(8). The Commission's Regulations require debts and obligations to be continuously reported until extinguished. 11 C.F.R. § 104.11(a). Moreover, the Regulations require that debts of $500 or less shall be reported as of the time payment is made or no later than 60 days after the obligation is incurred. Debts in excess of $500 are required to be reported at the time of the transaction. 11 C.F.R. § 104.11(b).

Based on the auditors' review, it appears that the Committee initially reported no debts, subsequently amended some of its reports (but not others) to indicate debts, and finally reported all required debts. The Audit staff determined that none of the debts and obligations owed by the Committee were disclosed on the original reports filed for the Committee's first six required

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7/ The Committee's original reports from its inception until the filing of the complaint never disclosed a single debt. The Committee's second response to the complaint stated it did not understand the definition of a debt, and thus did not report debts. Nevertheless, the Committee assured contributors making primary contributions after the date of the primary that it did have a debt. See February 26, 1985, General Counsel's Report at p.4 n6.

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reports.[8] On December 17, 1984, as part of its response to the complaint, the Committee amended its 1984 July Quarterly, October Quarterly and Pre-General Election Reports, disclosing a total of $850,686.33 in previously undisclosed debts and obligations. On August 1, 1985, the Committee amended all reports included in the audit period to report debts of $1,182,192.02 for the first six reporting periods. The auditors note that they have adjusted this reportable debt figure down to $1,169,026.80. This amount includes $96,790.73 of recurring debts which are reportable on subsequent Schedule D's until extinguished; therefore, the auditors have concluded that the Committee initially failed to disclose $1,072,266.07 in debts and obligations ($1,169,026.80 - $96,760.73) during the first six reporting periods. Because the Commission has already made a reason to believe determination regarding this apparent violation of section 434(b)(8), this Office makes no additional reason to believe recommendation, but will notify the Committee of the amount of debt determined not to have been initially reported.

D. Primary Debt

The Commission's reason to believe determinations did not encompass possible violations surrounding allegations in the complaint that the Committee violated 2 U.S.C. § 441a(f) by accepting primary contributions after the date of the primary at a time when it lacked a primary debt. The Act prohibits persons from contributing more than $1,000 per election to an authorized

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[8] These reports are the 1983 Year End, 1984 April Quarterly, Pre-Primary, July Quarterly, October Quarterly, and Pre-General.

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committee of a candidate. 2 U.S.C. § 441a(a)(1)(A). An election is defined as a general, special, primary, or runoff election. 2 U.S.C. § 431(1)(A). The Commission's Regulations provide that "with respect to any election" means in the case of a contribution designated in writing, the election so designated, except that a contribution made after a primary election and designated for the primary election shall be made only to the extent that the contribution does not exceed the debts outstanding from the primary election. 11 C.F.R. § 110.1(a)(2)(i). Political committees are prohibited from accepting contributions exceeding the Act's limitations. 2 U.S.C. § 441a(f). Thus, the Gramm Committee could accept the numerous contributions it received that were designated for the primary after the date of the primary only if it had a primary debt.

The auditors have concluded that, based on information provided by the Committee, it appears the Committee had sufficient primary debts "to accommodate the Committee-generated Late Primary contributions total." Audit Report at 12.[9/] Therefore, there does not appear to be violations of section 441a(f) from the Committee's acceptance of primary contributions after the date of the primary.

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9/ The auditors reached this conclusion using figures of early general election contributions and late primary contributions provided by the Committee. The auditors tested these figures and determined that 68% of the late primary contributions and 66% of the early general contributions were not designated properly. The auditors' review for excessive contributions encompassed these contributions for purposes of identifying excessive contributions resulting from improper designations and these excessives are included in the discussion at Section IIA.

E. Prohibited Contributions

The Commission found no reason to believe the Committee violated 2 U.S.C. § 441b. Underlying this determination was the previously noted corporate contribution made in the name of M.N. Bostick.[10/] Based on a review of the Committee's reports of refunds, the auditors found 151 other apparently prohibited corporate contributions totalling $10,889.93. Of these, 127 contributions totalling $9,708 were found not to have been refunded within 30 days of deposit.[11/] Refunds were not made for most of these prohibited contributions until many months after the dates they were deposited. In some instances more than a year passed until refunds were made. Moreover, in one instance the Committee made a refund of an apparent corporate contribution, and voided this refund check when the contributor stated he had intended to write the check from a personal account rather than a corporate account. A listing of these contributions are contained at Attachments F and G to the Audit Memorandum.

The Act prohibits corporations from making a contribution or expenditure in connection with any election. 2 U.S.C. § 441b(a).

10/ See footnote 1. The contribution made by KWTX will be required to be refunded by the Committee as a condition of conciliation.

11/ Excluded from this figure were 16 contributions for which original desposit dates are unknown, and thus it could not be determined whether timely refunds were made.

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Political committees are prohibited from knowingly accepting such contributions. Id.

In the instant case the Committee accepted 151 prohibited contributions totalling $10,889.93. Of these, 127 contributions totalling $9,708 appeared not to have been refunded within thirty days. Therefore, this Office recommends that the Commission find that there is reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441b(a).

F. Omission of Disclosure Information

The Commission also found reason to believe the Committee and its treasurer violated 2 U.S.C. § 434(b)(3)(A). This section requires the disclosure of the identification of persons whose contributions, in the aggregate, exceed $200. The auditors, on a sample basis, reviewed the Committee's original reports in relation to contribution records and determined that the Committee had failed to include all required information, but that amended reports materially corrected these deficiencies. However, the auditors' review revealed, with respect to both original and amended reports, that the Committee had failed to disclose the required employer information. Based on a review of the Committee's solicitation materials, it appeared to the auditors that the Committee has demonstrated best efforts to obtain missing employer information.

The auditors also examined specific reporting irregularities noted in the General Counsel's Report and Factual and Legal Analysis in this matter regarding 22 contributors. The auditors

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included 11 of these contributors on the list of apparent excessive contributions.[12/] Information regarding the others was corrected on the amended reports filed by the Committee.[13/] Information disclosed on the Committee's amended reports regarding Arthur Seeligson, III, Arthur Seeligson, Jr., and Ross Workman is still incorrect.

Pursuant to 2 U.S.C. § 434(b)(3)(A), reports shall include the identification of each person (other than a political committee) who makes a contribution or contributions that exceed $200 to the reporting committee during the reporting period. Identification of an individual is defined as the name, mailing address, occupation and employer. 2 U.S.C. § 431(13)(A). When a treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit the information required by the Act for a political committee, any report of such committee shall be considered in compliance with the Act. 2 U.S.C. § 432(i). The Commission's Regulations state that, for reporting the identification of individuals, the treasurer will not be deemed to have exercised best efforts to obtain the required information unless he or she has made at least one

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12/ The contributors are: G.W. Sanford, Jr.; Peter Gill; William Burford; Thomas Hartin; Don Lummus; R.L. Foree; David Rogers (Anita); Mary Crowley (David); Michael Hutchinson; Arthur Cary; and Doug Conlee.

13/ These are: B.S. Baker; Gene Overbeck; Daniel Parker; G.W. Sanford, Sr.; The National Home Builders PAC; Mrs. Andrew Fasken; National Federation of Independent Businesses; and William Martin.

effort per solicitation either by a written request or by an oral request documented in writing. 11 C.F.R. § 104.7(b).

In the instant case, the auditors state, based on their sample review of disclosure information, that the Committee's amendments appear to have materially corrected the insufficient disclosure information noted on its original reports. The auditors have also stated that the Committee appears to have satisfied the Regulations' best efforts requirements regarding employer information, and that most of the specific reporting problems noted in the General Counsel's Report appear to have been corrected. Nevertheless, incomplete and inaccurate contributor information was on the public record for more than a year. Accordingly, violations of 2 U.S.C. § 434(b)(3)(A) should be pursued.

G. The House Transfer

In order to address the accuracy of the Committee's initial cash on hand figure, the auditors examined the composition of a $337,327 transfer made to the Committee by the Senator's House Committee ("House Committee") on July 1, 1983. The House Committee was the Senator's authorized committee for a February 12, 1983, special election in the 6th District of Texas. Of this transferred amount, the auditors determined that $265,762.22 was deposited into the House Committee's bank account after the date of the February 12, 1983 primary, thus raising the possibility that funds received by the House Committee after the special election were included in the transfer.

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Pursuant to 11 C.F.R. § 110.3(a)(2)(iv), transfers may be made between a candidate's previous campaign committee and his or her currently authorized committee, as long as none of the funds transferred contain contributions that would be in violation of the Act. See also 2 U.S.C. § 441a(a)(5)(C) and 11 C.F.R. § 110.3(a)(2)(v). In its advisory opinions the Commission has addressed such transfers between two authorized committees of a candidate, and has determined that contributions received after the date of an election may be transferred subject to the limitations of 2 U.S.C. § 441a(a) as applied to the next election. Contributions received prior to an election, but which are not used, may be transferred as excess campaign funds outside the limitations of 2 U.S.C. § 441a(a). See Advisory Opinions 1977-24, 1977-29, 1978-37, 1980-30, 1980-32, 1980-60, 1980-143, 1981-9, 1982-39, 1984-32 and 1985-5.

In the instant case, the auditors determined that the House Committee made deposits totalling $265,762.22 into its account after the special election. The House Committee asserted, however, that only $59,683.46 of this amount was actually received after the date of the special election, and that the remainder of the amount transferred was deposited after the date

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of the special election due to the influx of contributions received immediately prior to the special election. Contribution records for the $59,683.46 were provided by the Committee as required.

The auditors determined that deposits made to the House Committee's bank account during the week after the special election totalled $227,648.22. The auditors received copies of the checks composing this House Committee's post-special election deposits in order to verify the Committee's assertion that these contributions were received after the special election and thus were classified properly as excess campaign funds.[14/] Their review determined that most of the checks deposited were received by the House Committee prior to the date of the special election. However, it appears that checks totalling $5,003 were dated after the date of the special election, and thus would be required to be transferred subject to the individual contributors' limitations under 2 U.S.C. § 44la(a) for the 1984 Senate election. Because this amount constitutes only 2.58% of the amount contained on the legible check copies provided, it

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14/ Not all copies of the these checks were provided by the First City National Bank of Bryan, Texas, and not all copies of the checks received were legible. The auditors were able to identify $194,249.80 in checks (or 85.33% of $227,648.22). Because the Bank indicated to this Office that it would make every effort to cooperate with the Commission's request for documents, and given that the check copies in question are four years old, this Office is satisfied that sufficient materials were provided for the auditors' review.

appears the House Committee's transfer contained primarily excess campaign funds, and thus, this Office makes no recommendations to the Commission regarding possible excessive contributions resulting from the House Committee's transfer.

H. Itemization of Expenditures

The Commission also found reason to believe the Committee violated 2 U.S.C § 434(b)(5)(A). This section requires a committee to report the name and address of each person to whom an expenditure in excess of $200 is made, together with the date, amount and purpose. The Commission made this finding because checks submitted by the Committee in an attempt to document a primary debt did not correlate with information on the Committee's reports on file with the Commission at that time.

The auditors reviewed the Committee's disbursement records in order to determine whether expenditures requiring itemization were itemized on the Committee's original reports. The auditors used a sample basis to compare the original reports with the August, 1985, amendments. The auditors determined that the Committee initially failed to itemize all expenditures requiring itemization. Based on this sample, however, the auditors state that the amended reports appear to materially correct these reporting problems. Moreover, the auditors report that specific reporting problems noted in the First General Counsel's Report at pages 3-9 have also been corrected on the amended reports. Notwithstanding the Committee's amendments, however, the public record remained incomplete from as early as January, 1984, when the

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Committee filed its 1983 Year End Report, until August, 1985, when the comprehensive amendments were filed. Therefore, it is the opinion of this Office that this reporting violation should also be pursued.

I. Checks Paid on Insufficient Funds

The auditors noted that 27 checks totalling $39,800.34 were drawn on the Committee's primary account at a time when the account did not contain sufficient funds to cover these checks. Nevertheless, these checks cleared the primary account and the Bank then assessed a $12.50 service charge for 18 of these 27 checks. The auditors further examined the Committee's records and determined that the Committee maintained separate primary and general accounts. When the net balances of these two accounts were combined, the auditors report that the combined net balances were in an overdrawn status for one day in the amount of $11,136.94.

The Act prohibits any national bank from making a contribution or expenditure in connection with a federal election. 2 U.S.C. § 441b(a). The Commission's Regulations provide that an overdraft made on a checking or savings account shall be considered a contribution by the bank or institution unless the overdraft is made on an account which is subject to automatic overdraft protection, the overdraft is subject to a definite interest rate which is usual and customary, and there is a definite repayment schedule. 11 C.F.R. § 100.7(b)(11).

The auditors report that the Regulations' requirements

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regarding overdrafts do not appear to have been satisfied. First, because the bank assessed a service charge on some of the checks, it does not appear that the primary account was subject to automatic overdraft protection. Second, based on the auditors' review of available records, it does not appear that the overdrafts were subject to a definite interest rate. Finally, the auditors found no evidence that a definite repayment schedule was in effect. Accordingly, this Office recommends that the Commission find reason to believe that the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. §441b(a) in connection with overdrafts made on the primary checking account. Moreover, this Office recommends that the Commission find reason to believe the First City National Bank violated 2 U.S.C. § 441b(a).

J. Timely Deposit of Contributions from Political Committees

The auditors tested the Committee's deposits of contributions from political committees on a sample basis in order to determine whether such contributions were timely deposited. The Act requires that every person who receives a contribution for an authorized committee shall, no later than 10 days after receiving such contribution, forward this contribution to the treasurer. 2 U.S.C. § 432(b)(1) and 11 C.F.R. § 102.8(a). The Commission's Regulations require that the treasurer be responsible for making deposits of the receipts of a political committee and that all deposits be made within 10 days of the treasurer's receipt. 11 C.F.R. § 103.3(a).

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The auditors' testing of the Committee's records revealed that contributions received from individuals were deposited in a timely manner, but 23.24% of the items tested for contributions from political committees were not deposited in a timely manner. Therefore, this Office recommends that the Commission find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 103.3(a).

K. Joint Fundraising Violations

The Commission also found reason to believe the Committee violated 11 C.F.R. § 102.17. Underlying this determination were responses to the complaint indicating the Committee had engaged in a joint fundraising event, when the Committee's reports did not reveal any joint fundraising activity. The audit revealed that the Committee did, indeed, participate in a joint fundraising event entitled the "Presidential Nomination Breakfast Ball" in August, 1984. Participants in the fundraising were the Texas Victory '84 Fund,[15/] the Republican Host Committee[16/] and the National Republican Senatorial Committee. The Gramm Committee operated as the joint fundraising representative. Pursuant to a written fundraising agreement, the participants sold individual tickets to this event for $1,500, with $1,000 to be received by the Friends of Phil Gramm and $250 each to Texas

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15/ The auditors identify this entity as an account/activity of the Texas Republican Congressional Committee, a federal political committee registered with the Commission.

16/ The auditors identify this entity as "an arm of the Dallas County Republican Party." Neither of these entities appears to be a registered political committee.

Victory '84 and the Republican Host Committee. The agreement provided that if a contributor reached his or her contribution limit for a single committee, the funds would be distributed equally to the remaining committees. The agreement added that when contributors reached their limit with respect to the Friends of Phil Gramm, the first $1,000 (or portion thereof) in ticket proceeds was to go to the National Republican Senatorial Committee for the individuals' memberships in the Inner Circle program. Expenses for the event were to be shared in proportion to income received, and a separate bank account was established. As discussed below, the auditors isolated three problems with the Committee's fundraising activity.

1. Misallocation of Proceeds

Pursuant to 11 C.F.R. § 102.17(a)(1) and (b)(2), political committees and other entities may conduct joint fundraising activity and may select one participant to act as joint fundraising representative. The fundraising representative must be a political committee and all contributions must be forwarded to the fundraising representatives. 11 C.F.R. § 107.17(b)(2). The fundraising representative pays all fundraising costs from gross proceeds and advanced funds, and then disburses net proceeds to each participant. Id.

The Regulations further provide that the fundraising representative shall allocate proceeds according to the formula stated in the fundraising agreement. 11 C.F.R. § 102.17(c)(6)(i). In instances such as the one at hand, where

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the fundraising participants are not all affiliated political committees, gross proceeds are first allocated to the participants and the fundraising representative is to calculate each participant's share of expenses based on the percentage of the total receipts allocated to each participant. 11 C.F.R. § 102.17(c)(7)(i)(A). Net proceeds are reached by the fundraising representative's subtraction of each participant's share of expenses from the amount that participant has been allocated from gross proceeds. Id. A participant may only pay expenses on behalf of another participant subject to the limitations of 2 U.S.C. § 441a(a). 11 C.F.R. § 102.17(c)(7)(i)(B). The Gramm Committee, as an authorized political committee, is a person under the Act, and thus is limited to contributing in aggregate, $20,000 per year to committees established and maintained by a national political party, and $5,000 per calendar year to any other political committee that is not an authorized committee. 2 U.S.C. § 441a(a)(1)(B) and (C).

The auditors note that the Gramm Committee apparently failed to meet the Regulations' requirements. First, the auditors' review revealed that the Committee miscalculated gross proceeds as $613,997.11 instead of $645,320.61.[17/] This incorrect gross

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17/ As discussed in subsection two, this error occurred because the Gramm Committee accepted $31,343.50 in gross proceeds into its own account instead of into the fundraising account. According to the audit memorandum, the Committee was aware that these deposits were made. The figure of $645,320.61 does not include $10,500 in contribution refunds.

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proceeds figure thus affected the allocation of operating expenditures (which are based on the percentage of total receipts allocated to each participant). This, in turn, resulted in the Gramm Committee having paid a greater share of the fundraiser's operating expenditures than appropriate ($8,676.17), and the Texas Victory '84 Fund, the Republican Host Committee and the NRSC having underpaid operating expenditures shares by $2,899.07, $5,270.88, and $506.22 respectively. Therefore, the Committee failed to satisfy the requirements of 11 C.F.R. § 102.17(c)(7)(i)(A).

The Gramm Committee was permitted to pay the expenses of the other committees subject to the Act's contribution limitations. 11 C.F.R. § 102.17(c)(7)(i)(B). Thus, the Gramm Committee's payments of fundraising expenses of $2,899.07 for the Texas '84 Victory Fund and $506.22 for the NRSC are facially within the limits of 2 U.S.C. § 441a(a). However, the Gramm Committee also appears to have made a $5,270.88 contribution to the Republican Host Committee, a state political committee. This contribution exceeds the limitations of 2 U.S.C. § 441a(a)(1)(C), and, because this amount exceeds $1,000, would appear to qualify this state committee as a federal political committee under the Act. See 2 U.S.C. § 431(4)(A).18/ Therefore,

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18/ Because such possible qualification resulted from an error caused by the Gramm Committee as joint fundraising representative, this Office makes no recommendations regarding either the Republican Host Committee's possible receipt of excessive contributions or its reporting and registration requirements under the Act.

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the Committee failed to satisfy 11 C.F.R. § 102.17(c)(7)(i)(B) and thus, this Office recommends that the Commission find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441a(a)(1)(C).

2. Failure to Report Joint Fundraising Activity

The Commission's Regulations also include reporting requirements for committees engaging in joint fundraising activity. As previously noted, fundraising entities must establish a separate depository account, and all joint fundraising proceeds must be deposited into this account within ten days of receipt. 11 C.F.R. § 102.17(c)(3)(ii). The fundraising representative shall report all funds received in the reporting period in which they are received. 11 C.F.R. § 102.17(c)(8)(i)(A). Additionally, each Schedule A filed by the fundraising representative shall clearly indicate that the contributions reported on that schedule are joint fundraising proceeds. Id. Following distribution of the net proceeds, each participating political committee shall report its share of net proceeds received as a transfer-in from the fundraising representative. 11 C.F.R. § 102.17(c)(8)(i)(B). Each participating political committee shall also file a memo Schedule A itemizing its share of gross receipts as contributions from those original contributors whose aggregate

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contributions exceed $200. Id. Finally, the fundraising representative shall report all disbursements in the reporting period in which they are made. 11 C.F.R. § 102.17(c)(8)(ii).

The auditors' review reveals a number of apparent joint fundraising violations regarding the receipt and reporting of joint fundraising proceeds. First, the Committee did not deposit all of the gross proceeds into the depository account. Instead, $28,343.50 of the $655.820.61 in proceeds 19/ was deposited directly into an account of the Committee, a fact acknowledged to the auditors by a representative of the Committee. Additionally, the auditors report that not all disbursements were made from the fundraising account. A Committee account paid $41,582.75 of the $669,059.86 in total disbursements. Therefore, the Committee did not utilize the depository account as required by 11 C.F.R. § 102.17(c)(3)(ii).

Second, although the committees held the fundraising event in August 1984, none of the joint fundraising activity was revealed until the Gramm Committee amended its reports in August, 1985. Thus, for more than one year no information regarding the Gramm Committee's joint fundraising activity appeared on the public record. As previously noted, these amendments understate

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19/ See footnote 17.

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gross proceeds and gross disbursements. These amendments include information that the Committee received net proceeds of $316,131.30 as a transfer-in. Prior to these amendments it appears the Committee had reported contributions comprising its share of net proceeds as if received directly by the Committee from contributors instead of as the result of a transfer-in. Therefore, the Committee failed to meet the requirements of 11 C.F.R. §§ 102.17(c)(8)(i)(A) and (B) and 102.17(c)(8)(ii).

3. Fundraising Notice

Additional problems are apparent from the joint fundraising notice used by the Committee. The Commission's Regulations provide detailed requirements for fundraising notices. See 11 C.F.R. § 102.17(c)(2)(i). Included within these provisions is the requirement that such notice include a statement informing contributors that contributions may be designated for a particular participant and that the stated allocation formula may be changed if a contribution would result in an excessive contribution to a participating entity. The Gramm Committee did not include this required information on the fundraising notice and thus failed to meet the criteria of 11 C.F.R. § 102.17(c)(2)(i).

L. Summary of Violations

This Office recommends that, based on new information resulting from the audit, the Commission find reason

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to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. §§ 441a(a)(1)(C) and and 441b(a). As previously noted, the Commission earlier determined there was no reason to believe this latter provision had been violated based solely on the Bostick contribution. The auditors have determined, however, that the Committee accepted other prohibited corporate contributions.

This Office also recommends that the Commission find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441b(a) in connection with overdrafts paid on the Committee primary account. A similar section 441b(a) recommendation is made regarding the First City National Bank of Bryan, Texas. Additionally, this Office recommends that the Commission find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 103.3(a) by failing to deposit contributions from political committees in a timely manner.

This Office makes no new recommendations regarding the Commission's previous determinations of violations of 2 U.S.C. §§ 441a(f), 434(b)(8), 434(b)(5)(A) and 434(b)(3)(A) and 11 C.F.R. § 102.17. However, because the Commission now has an expanded factual basis for this findings, this Office's proposed factual and legal analysis includes a discussion of these recommendations in light of the audit report.

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

The Committee has made repeated requests for pre-probable cause conciliation. The Commission earlier determined to deny this request in order that the audit could be conducted to understand the nature and extent of the possible violations. In view of the comprehensive, detailed audit report, it is the opinion of this Office that we have sufficient documentation of the nature and extent of the Committee's violations. Accordingly, we recommend that the Commission grant the request of the Friends of Phil Gramm and John Baxter, as treasurer, to enter into conciliation negotiations prior to a finding of probable cause to believe.

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RECOMMENDATIONS

1. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441a(a)(1)(C) and 11 C.F.R. § 103.3, as well as, 2 U.S.C. § 441b(a) regarding receipt of prohibited corporate contributions and overdrafts paid from the Committee's primary account.

2. Enter into conciliation prior to a finding of probable cause to believe with the Friends of Phil Gramm and John Baxter, as treasurer.

3. Find reason to believe the First City National Bank of Bryan, Texas, violated 2 U.S.C. § 441b(a).

4. Approve the attached conciliation agreement, factual and legal analyses 21/ and letters.

10/14/87
Date

Lawrence M. Noble
General Counsel

Attachments
1. Audit Memorandum (and Attachments)
2. Proposed Factual and Legal Analyses (2)
3. Proposed Conciliation Agreement
4. Proposed Letters (2)

21/ The attached Factual and Legal Analysis does not contain attachments C, D, F and G to the Audit Report in order to avoid needless duplication. These will be provided to the Committee as part of the Factual and Legal Analysis.

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FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

MEMORANDUM

February 9, 1987

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: RESULTS OF THE AUDIT OF
FRIENDS OF PHIL GRAMM (MUR 1837)

I. Background

Attached for your information are the findings of the audit of Friends of Phil Gramm ("the Committee"). This matter arose from the Office of General Counsel's review of a complaint filed with the Commission on November 1, 1984 by Ms. Donna Mobley of Austin, Texas against Senator Phil Gramm, the Committee, the Committee's treasurer and assistant treasurer, and 170 other persons.

The audit was conducted in accordance with 2 U.S.C. §437g (a)(2) which provides that, when the Commission determines, by an affirmative vote of 4 of its members, that it has reason to believe that a person has committed a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), the Commission shall make an investigation of such alleged violation, which may include an audit.

On March 5, 1985, the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), and 434(b)(3)(A), as well as 11 C.F.R. § 102.17. Specifically, the Commission found reason to believe the Committee and John Baxter, as treasurer, violated 2 U.S.C. § 434(b)(8) by failing to continuously report outstanding debts and obligations. Additionally, the Commission found reason to believe the Committee and its treasurer violated 2 U.S.C. § 434(b)(5)(A) by failing to properly report expenditures. The Commission also found reason to believe that

Attachment to 10/14/87 GC Report

ATTACHMENT #1(1)

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the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 102.17 by failing to abide by the joint fundraising regulations. Moreover, the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. § 441a(f) by accepting contributions exceeding the Act's limitations and by accepting contributions without proper designations. The Commission also found reason to believe the Committee and Mr. Baxter, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) by failing to correctly and fully identify contributors. Finally, because of the complexity of the documentation in this matter, the Commission also determined to refer the Committee to the Audit Division for an audit pursuant to 2 U.S.C. § 437g(a)(2).

Upon the Committee's refusal to permit the audit, the Commission subpoenaed the Committee's books and records on June 20, 1985. On that same date, the Committee filed suit in Dallas, Texas seeking judicial intervention on the Commission's decision to find reason to believe that any violations had occurred. On June 24, 1985, the Commission denied the Committee's motion to quash the subpoena and authorized the Office of General Counsel (OGC) to file suit in Texas for subpoena enforcement.

At an October 7, 1985 show cause hearing in Dallas, the court granted the Commission's motion to dismiss the Committee's attempt to quash the subpoena. On October 31, 1985, a second show cause hearing was held on the relevancy of the Commission's subpoena. This hearing was suspended in order to permit discussions between the Committee and OGC regarding the scope of the Commission's subpoena. A tentative agreement was reached but when negotiations on the scope of the subpoena reached an impasse, both the Committee and OGC submitted proposed orders to the court. On January 16, 1986, United States District Judge Robert W. Porter signed the Commission's order with minor modifications.

The audit commenced on February 19, 1986 in Dallas, Texas. On March 12, 1986, telephone requests were made to the Committee's legal counsel to have the Committee's records moved to the Federal Election Commission (FEC) in Washington, D.C. for completion of the audit. A follow-up letter was sent to the Committee's counsel on March 13, 1986. All requests were denied.

As a result of Committee counsel's refusal to have the Committee's records relocated to the FEC in Washington, D.C., negotiations between its counsel and OGC led to the Commission-approved submission of a motion clarifying the January 16, 1986 order to allow for the records to be moved to Washington, D.C. On May 16, 1986, Judge Porter signed the order which allowed the records to be relocated to Washington, D.C.

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Delivery of the Committee's records was delayed while the Committee's counsel and OGC negotiated an agreed inventory of the records, but on July 1, 1986, the records were received at the FEC. Upon inspection of the records by Committee counsel, the fieldwork resumed on July 1, 1986 and concluded on January 30, 1987.*/ The findings detailed below were not discussed in an exit conference with the Committee upon advice of your office.

The Friends of Phil Gramm registered with the U.S. Senate on October 4, 1983 as the principal campaign committee of William Philip (Phil) Gramm, Republican candidate for the U.S. Senate from the state of Texas. The Committee maintains its headquarters in Dallas, Texas.

The audit covered the period from the Committee's inception, July 1, 1983 **/, through December 31, 1984, the final coverage date of the last report filed at the time the audit was authorized. The Committee reported a beginning cash balance of $-0-; total receipts for the period of $9,863,654.24; total disbursements for the period of $9,509,727.33; and a closing cash balance on December 31, 1984 of $353,926.91. These figures were reported on amendments filed August 1, 1985, which were the culmination of work performed by Huckaby and Associates, the firm hired by the Committee after the complaint had been filed. Prior to these amendments, the Committee reported a begining cash balance of $-0-; total receipts for the period of $9,799,324.82; total disbursements for the period of $9,450,799.46; and a closing balance on December 31, 1984 of $348,525.36.

This report is based on documents and workpapers supporting each of its factual statements. They form part of the record upon which the Audit Division based its conclusions on the results of this audit and are available to Commissioners and appropriate staff for review.

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*/ It should be noted that the Audit staff concluded fieldwork upon completing its review of records relative to the Committee to Re-elect Phil Gramm (House Committee). These records were provided on January 13, 1987 (See Finding G).

**/ The Committee's inception date, July 1, 1983, is based on the termination of the Committee ~~to Re-elect~~ Phil Gramm (House Committee) on that date by transfer of its remaining funds to the Committee.

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The treasurers of the Committee during the period audited were:

Mr. Dennis Goehring	10/4/83 - 12/1/83
Mr. John P. Baxter	12/2/83 - present.

Scope

The audit included a review of the Committee's disclosure reports for completeness and mathematical accuracy; reconciliation of bank accounts; review of individual receipt and disbursement transactions for compliance with limitations and reporting requirements; an analysis of debts and obligations; and such other audit procedures as deemed necessary. As a result of the extent of apparent violations, and upon advice of your office, a full scope audit was performed, with the exception of an exit conference.

II. Summary of Findings

A. Excessive Contributions from Individuals

Section 441a(a) of Title 2, United States Code states, in part, that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which in the aggregate exceed $1000. An election is defined at 2 U.S.C. § 431(1)(A) to include general and primary elections. The regulations at 11 C.F.R. §§ 110.1(a)(2)(i) and (ii) state, in relevant parts, that "with respect to any election" means in the case of a contribution designated in writing for a particular election, the election so designated; for a contribution not designated in writing, for a primary election if made on or before the date of the primary, and for a general election if made after the date of the primary.

In addition, 11 C.F.R. § 104.8(d) requires that a contribution by more than one person shall indicate on the written instrument or on an accompanying written statement signed by all contributors, the amount to be attributed to each contributor. Finally, the Act at 2 U.S.C. § 441a(f) states, in relevant part, that no candidate or political committee shall knowingly accept any contribution in violation of any limitation on contributions.

The Audit staff determined that the Committee 1) accepted excessive contributions, 2) reattributed some excessive portions to other elections without documentation from the contributor, 3) attributed excessive portions to persons who did not sign the instrument or other documentation, and 4) failed to either refund

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the excessive portion or to obtain the necessary documentation to rectify the excessives in a timely manner.

Background

The receipt of apparent excessive contributions by the Committee was addressed in the General Counsel's Report on MUR 1837 under the topics of Facially Excessive Contributions (p. 12, 13) and Designation Problems (p. 23-37). The Committee was involved in both a primary and general election during the period covered by the audit.

After the complaint was filed, the Committee engaged Huckaby and Associates to review Committee records and prepare necessary amended disclosure reports. Huckaby and Associates created a new contributor data base file from source documents (copies of contributor checks, deposit tickets, and response devices returned by contributors) and the existing data base(s). They merged the data into a single data base consisting of all contribution information for the period audited with respect to the Senate campaign. The Committee amended all reports for the audit period based on this reconstructed data base.

Although at least one other computerized data base existed prior to Huckaby and Associates, the reconstructed data base was the only one available to the Audit staff for review. During fieldwork the Audit staff first reconciled the reconstructed data base to total bank deposits and to the amended disclosure reports. Two samples were drawn to test the data base for, among other things, 1) quality of data entry, 2) itemization, and 3) quality and completeness of information as disclosed on amended and original reports. One sample was drawn from a data base edit of deposit (batch) listings and one from the response devices returned by contributors. Finally, the Audit staff developed a test deck of hypothetical contributor data for entry into the data base to confirm that the computerized portion of the Committee's receipt processing system was functioning properly.

The bank reconciliation and the attribute testing performed on the reconstructed data base indicated that errors identified on the original reports were substantially corrected on the amended reports. The quality of data entry was within acceptable limits.

The change procedure within the contributor data base appears to be weak. According to the Committee consultant, the program design does not provide a trail for any changes made to data after the initial entry. Furthermore, no written documentation is retained to properly support any changes.

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The Committee, after engaging Huckaby and Associates, sent confirmation requests to contributors on May 29, 1985 in order to document the attribution of certain contributions to spouses or the reattribution of certain contributions to another election. The requests were sent in the form of a letter (hereinafter "Split letter") containing signature lines below the committee-prepared contribution history. See sample at Attachment A.

The Committee also sent, as a result of the work performed by Huckaby and Associates, confirmation requests to reattribute excessive contributions to the 1990 election (hereinafter "1990 letters"). The reattribution to 1990 obviated the need to refund the excessive portion. See sample at Attachment B.

Fieldwork

Introduction

The Audit staff had available for review 1) copies of most of the contributor checks, 2) original reports, 3) copies of contributor checks for contributions made to a Joint Fundraiser the proceeds from which were shared with the Committee, and records reconstructed/corrected by Huckaby and Associates which included 4) amended reports, 5) data base edits (alpha galley, family list, deposit (batch) listings, and selected contributor histories), 6) split letters sent to contributors, and 7) 1990 letters sent to contributors. The Audit staff reviewed this information in an effort to identify possible excessive contributions.

Procedures Used

Initially, the Audit staff created a file of possible excessive contributions containing a record (index card) for each contributor whose aggregate contributions exceeded $1000. These contributors were identified from the following sources:

1) Original disclosure reports. These reports were the only record available for our review for contributions that pre-date the amendments and revised data base prepared by Huckaby and Associates. The Audit staff traced some Audit-generated index cards to the amended reports to create histories for some contributors whose contributions aggregated in excess of $1000.

2) Split letters;

3) 1990 letters;

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4) Alpha galley of individual contributors and family list edit of contributors. These sources included the aggregate total of contributions from each individual;

5) Copies of contributor checks for contributions made to a joint fundraiser the proceeds from which were shared with the Committee. These checks were mostly for amounts in excess of $1000.

The Audit staff merged the data from these records to create a file of all contributors who may have made excessive contributions. The Committee provided, at the Audit staff's request, complete contribution histories per the Committee's computerized data base for each of these contributors. The Audit staff was then able to retrieve copies of contributor checks and accompanying documentation relative to these contributions. This material was reviewed to ascertain the appropriate election and contributor attributions/designations. Finally, the Audit staff compared the appropriate attributions/designations to the attributions/designations shown on the contributor histories generated by the Committee.

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Attribution of Contribution(s) to Individual(s)

The Audit staff applied the following criteria to determine correct attributions of the contributions in question:

1) The contribution was attributed to the person who signed the check and/or contemporaneous documentation, in accordance with 11 C.F.R. §§ 104.8(c) and (d), unless the check was signed by an apparent agent;

2) Contributions in the form of checks signed by an apparent agent were attributed to the contributor identified on the letterhead of the check;

3) Missing checks: If the check was not found or was illegible, the attribution shown on the history was accepted. The Audit staff was able to locate and review most of the checks.

Attribution of Contributions(s) to a Specific Election(s)

The Audit staff applied the following criteria to determine correct attributions of the contributions in question:

1) All checks dated on or before May 5, 1984 (the date of the primary) were attributed to the primary election, unless the check or response device contained a contributor-generated designation to the general election;

2) Likewise, contributions in the form of checks dated after May 5 were attributed to the general election unless otherwise notated by the contributor. Committee notations were not accepted for our review;

3) If the check was not found, the deposit date May 7, 1984 (the first banking day after the primary) was used as the cutoff between the primary and general election contributions;

4) If the check was not found and the contribution history indicated that it was either a late primary or early general contribution, the contribution was scheduled as an exception.

Days in Excess

Each excessive contribution was evaluated for number of days-in-excess, counted from, but exclusive of, the date of deposit to May 29, 1985, the day the Committee dated the letters they mailed to the contributors. In cases where refunds were made prior to May 29, 1985 the excessive portions and number of days in excess were adjusted accordingly. The Audit staff applied a 30-day threshold, as requested by the Office of General Counsel, relative to the rectification of the excessives.

Excessive contributions

Contributions found to be excessive are scheduled on Attachments C and D. Attachment C includes the excessives identified as a result of our review of the contributor histories we requested from the Committee. Attachment D includes the excessives identified as a result of our review of both Committee-generated attribution letters and Audit-generated histories. Entries on these two attachments were compared and any duplication was eliminated.

Explanation of Codes

If the contribution was found to be excessive because the Committee did not adequately document the attribution to an election, the excessive portion was notated "A" on the attachments. If the contribution was deemed as excessive because the Committee did not adequately document the attribution (no signature of contributor to whom all or a portion of the contribution was attributed), the excessive portion was notated "B". The code "C" indicated that the check associated with the excessive contribution was signed by an agent. Some excessive contributions could not be attributed to one of these codes; some excessives could be attributed to more than one code.

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Photocopies

The contributor histories as well as the check copies located were photocopied for all excessive contributions. The photocopied material is within two groups:

1) Contributor histories generated from the Committee data base with corresponding checks. If the excessive related to an inappropriate contributor attribution (code "B"), then the contributor history of the contributor to whom the contribution was attributed in error was also copied;

2) Contributor histories compiled using Committee attribution letters ("Split letters" and "1990 letters"), and histories constructed based on audit review of amended disclosure reports.

Results

The Audit staff, after applying the aforementioned criteria, identified 525 excessive contributions totaling $359,940.35 as a result of our review of the histories generated from the Committee data base (see Attachment C). In addition, the Audit staff identified 349 excessive contributions totaling $331,058.70 based on our review of contributor histories compiled from Committee attribution letters and amended disclosure reports (see Attachment D). In total, the Audit staff found that the Committee accepted 874 excessive contributions totaling $690,999.05.

B. Contributions in Name of Another

Section 441f of Title 2 of the United States Code states that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.

In addition, Section 110.4(b)(2)(ii) of Title 11, Code of Federal Regulations states that examples of "contribution in the name of another" include making a contribution of money or anything of value and attributing as the source of the money or the thing of value another person when in fact the contributor is the source.

Section 104.8(d) of Title 11, Code of Federal Regulations states that a contribution which represents contributions by more than one person shall indicate on the written instrument, or on an accompanying written statement signed by all contributors, the amount to be attributed to each contributor.

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During our review of possible excessive contributions discussed at Finding A, the auditors noted 15 contributions which appear to have been made either entirely, or partially, in the name of another. These contributions, or portions thereof, apparently made in the name of another, total $21,550.

Of the 15 written instruments which contained apparent contributions in the name of another, 6 were annotated as attributable to the drawer of the instruments, as well as other individuals. The other 9 were written instruments annotated as attributable to other individuals. The only signatures contained on the 15 written instruments, or accompanying written statements, were those of the drawer of the instruments. It should be noted that 7 of the above mentioned contributors are included in the excessive contribution finding.

Photocopies of the written instruments for the apparent contributions in the name of another will be attached to this memorandum. See Attachment E for a listing of these items.

C. Reporting of Debts and Obligations

Section 434(b)(8) of Title 2, United States Code requires each report filed by the treasurer of a political committee to disclose the amount and nature of outstanding debts and obligations owed by the committee.

Section 104.11(a) of Title 11, Code of Federal Regulations states, in part, that debts and obligations shall be continuously reported until extinguished. In addition, 11 C.F.R. § 104.11(b) states, in part, that debts of $500 or less shall be reported as of the time payment is made or no later than 60 days after the obligation is incurred and that debts in excess of $500 shall be reported at the time of the transaction.

The Audit staff performed a review of the reported debts and obligations owed by the Committee. There were eight report periods during the time period covered by the audit (7/1/83 - 12/31/84).

The basis of the complaint filed November 1, 1984 was that the Committee failed to report and itemize its outstanding debts and obligations on its 1984 Pre-Primary, July Quarterly and October Quarterly reports. The Audit staff determined that no debts and obligations owed by the Committee were disclosed on the original reports filed for the first six report periods (Year-End '83, April Quarterly '84, Pre-Primary, July Quarterly '84,

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October Quarterly '84 and Pre-General). For the two reports filed subsequent to the November 1, 1984 complaint (Post-General and Year-End '84), the difference between the total amount of debts and obligations disclosed originally versus amended is immaterial. These reports covered the period 10/18/84 -12/31/84.

On December 17, 1984, the Committee filed amendments for the July Quarterly, October Quarterly and Pre-General reports which disclosed a total of $850,686.33 in previously undisclosed debts and obligations (aggregate total of outstanding balances at close of 3 reporting periods).

On August 1, 1985, amendments were filed by the Committee for each of the eight reports included in the entire audit period (7/1/83 - 12/31/84). These amendments were the culmination of work performed by Huckaby and Associates. Included in these amendments were Schedule D's (Debts and Obligations) totaling $1,182,192.02 for the first six report periods (7/1/83 - 10/17/84).

The Audit staff reviewed the 8/1/85 amended Schedule D's and adjusted the reported total debts and obligations to exclude reported entries not required to be disclosed. These adjustments included: incorrect billings, debts not required to be reported and debts not outstanding at the close of the report period and for the first 6 periods covered by the audit, totaled $13,165.22. The adjusted debts and obligations for the Committee's first six original reports totaled $1,169,026.80 ($1,182,192.02 - $13,165.22). It should be noted that included in this figure is $96,760.73 of recurring debts which are reportable on subsequent Schedule D's until extinguished. These recurring debts are included in the total debts and obligations for each report period until paid.

In summary, the Committee initially failed to disclose $1,072,266.07 ($1,169,026.80 - $96,760.73) of debts and obligations in their first six report periods (7/1/83 -10/17/84).

D. Primary Debt

Section 441a(a)(1) of Title 2, United States Code, states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1000. Section 110.1(a)(2)(i) of Title 11, Code of Federal Regulations, states, in part, that "with respect to any election" means in the case of a contribution designated in writing, the election so designated, except that a contribution made after a primary election and designated for the primary election shall be made only to the extent that the contribution does not exceed net debts outstanding from the primary election.

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As discussed in Finding C, the main thrust of the complaint filed November 1, 1984 was that the Committee failed to report and itemize its outstanding debts and obligations on its 1984 Pre-Primary, July Quarterly and October Quarterly reports. The Audit staff determined that no debts and obligations owed by the Committee were disclosed on the original reports filed for the first six report periods (Year-End '83, April Quarterly '84, Pre-Primary, July Quarterly '84, October Quarterly '84 and Pre-General).

Based on the work performed by Huckaby and Associates, the Committee received $408,896.15 in contributions after May 5, 1984, the date of the primary election, which were considered by the Committee as applicable to the primary election (Late Primary). In addition, the Committee received $119,977.69 in contributions prior to May 5, 1984 which were considered applicable to the general election (Early General). In the Committee's response to MUR 1837, the Committee contends that it did have a primary debt.

The Audit staff reviewed the Committee's cash-on-hand and disbursement records to calculate the Committee's financial position relative to the May 5, 1984 primary election. The Committee maintained separate operating accounts for primary and general election activity. The auditors reviewed invoices in support of disbursements from both accounts and determined that for the period May 6, 1984 through October 17, 1984, paid primary-related expenses totaled $576,309.94. The Committee's response to MUR 1837 noted that total primary expenses paid during the same period equaled $571,298.11. The difference between the auditor's and the Committee's calculation was $5,011.83, a difference of less than 1%.

The auditors determined that the Committee's reconciled cash-on-hand in the primary operating account as of May 5, 1984 was $248,612.88. Thus the amount by which outstanding net primary-related expenses exceeded reconciled cash-on-hand equaled $327,697.06 ($576,309.94 - $248,612.88).

The Audit staff concluded that if the Early General contributions total provided by Huckaby and Associates was accurate, then the Committee had enough net primary debt to accomodate the Committee-generated Late Primary contributions total. This conclusion is based on the following:

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As of May 5, 1984:	
Reconciled Cash-On-Hand	$248,612.88 */
Less:	
Early General Contributions	(119,977.69)
Adjusted Cash-On-Hand	$128,635.19
Gross Debt	$576,309.94
Less:	
Adjusted Cash-On-Hand	(128,635.19)
Net Primary Debt	447,674.75
Less:	
Late Primary Contributions	(408,896.15)
Primary Debt Buffer	$ 38,778.60

The auditors further determined that the net primary debt could increase as a result of unpaid bills as of 10/17/84, totaling $58,924.50, not included in our net debt calculation. The Committee claims in its response to MUR 1837 that these bills are primary-related. The Committee also claims in its MUR response that some legal, accounting and fundraising expenses attributable to the primary were never allocated to the primary and were not included in their primary debt calculation. These expenses could also increase the net primary debt if primary-related.

The auditors did not verify that the 10/17/84 unpaid bills or the legal, accounting and fundraising expenses were primary-related because we had already concluded that the Committee had enough net primary debt to accomodate the Committee-generated Late Primary contributions total.

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*/ Reconciled Cash-On-Hand includes $119,977.69 of Early General contributions, according to work performed by Huckaby and Associates.

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The Audit staff tested the Late Primary and Early General contribution totals provided by Huckaby and Associates to determine if the contributions were properly designated by the contributors. The result of testing the Late Primary contributions was that 68% were not designated properly and the result of testing the Early General contributions was that 66% were not designated properly. It should be noted that for this test, contributions for which split letters were available were accepted as properly designated even though the letters were received long after the contributions were made. Since the Audit staff was performing a comprehensive excessive contributions review, it was our opinion that the excessives review would encompass any Late Primary and Early General contributions lacking proper contributor designations.

E. Prohibited Contributions

Section 441b(a) of Title 2, United States Code states, in part, that it is unlawful for any national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with any election to any political office.

1. Committee's Verification of Prohibited Contributions

After the complaint was filed on November 1, 1984, the Committee engaged Huckaby and Associates to review Committee records and prepare necessary amended disclosure reports. Huckaby and Associates reconstructed the contributor data base file by merging information from copies of contributor checks, deposits tickets, response cards completed by contributors and the existing data base(s). During this process, contributor check copies from possible corporate entities were scheduled by Committee personnel on memo pads and scratch sheets to enable corporate status verification at the Texas Secretary of State's office in Austin, Texas.

In order to verify the accuracy of the Committee's procedures, the audit performed testing whereby a sample was drawn from the schedules compiled by the Committee.

The results of testing the Committee's handling of possible corporate contributions on a sample basis indicated that only 0.79% of the contributions tested were corporate contributions not identified as such by the Committee. The auditors concluded that the Committee's verification procedures performed by Huckaby and Associates were accurate in all material aspects and could be relied upon for the purpose of our review.

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2. Contribution Refunds

The Audit staff noted that the Committee reported 146 contribution refunds, totaling $10,709.93, to apparent corporate donors. These refunds related to contributions received during the period covered by the audit (7/01/83 - 12/31/84). Of these 146 refunds, 123 ($9,628) were made on 6/29/85 and 6/30/85 and resulted from the verification procedures discussed above. The other 23 refunds ($1,081.93) were all made prior to November 1, 1984, the date the complaint was filed. The auditors verified that the 146 refund checks were negotiated by the payees.

The Audit staff was able to determine the original date of deposit for 130 of the 146 apparent corporate contributions by locating photocopies of original contributor checks along with batch information for 122 items and by equating contributions to items listed on contributor histories for 8 items.

Of the 122 check copies reviewed, 4 contributor checks, totaling $235, appear to be drawn on other than corporate accounts and thus were not required to be refunded. While searching for the check copies, the Audit staff identified 9 additional checks, totaling $415, which were drawn on corporate accounts. Although these 9 contributions were not refunded, other contributions in the form of checks drawn on these accounts were refunded to the same contributors.

The Audit staff applied a 30-day threshold, as requested by the Office of General Counsel, from the date of deposit to the date of refund for the contribution refunds for which the original date of deposit was available. Based on our review, eight contributions, totaling $380.93, were refunded within the 30 day window.

In summary, based on the auditor's review of contribution records and Committee reports, 151 apparent prohibited contributions, totaling $10,889.93, were received by the Committee during the period of the audit. Of these, 127 ($9,708) were verified by the Audit staff as not refunded within 30 days of date of deposit.

The following table explains the breakdown of our contribution refund review:

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Reported Refunds of Corporate Contributions	146	$10,709.93
Repeat Donors Not Refunded	9	415.00
Refunds to Non-Corporate Donor	(4)	(235.00)
Subtotal- Apparent Corporate Contributions	151	$10,889.93
Less:		
Refunds With Unknown Deposit Dates for Original Contributions*/	(16)	(801.00)
Refunds Within 30 Days	(8)	(380.93)
Corporate Contributions Not Rectified Within 30 Days	127	$9,708.00

Photocopies of the relevant original contributor checks and contributor histories will be attached to this memorandum. See Attachment F for listing of the 146 contribution refunds and the 9 repeat donors not refunded.

3. Voided Contribution Refunds

The Audit staff noted that an additional 29 refund checks, totaling $1,955, were subsequently voided when the Committee determined the contributions were not prohibited based on personal draw letters from the contributors and inquiries made at the Texas Secretary of State's office.

*/ These contribution refunds were excluded because we were unable to determine if they were refunded within 30 days of date of deposit.

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The Audit staff verified that 28 of the 29 voided refunds were acceptable based on our review of personal draw letters and Secretary of State inquiry. The sole exception was a $50 refund. The response from the contributor regarding this contribution noted that he meant the contribution to be personal but wrote the check on the wrong account. A Committee representative stated that this refund was voided based on the contributor's response. A copy of the refund check and letter from the Texas Secretary of State is attached (Attachment G).

4. MUR Item

The Audit staff also reviewed the items mentioned in Section I (Apparent Violations), Part 4 (A Corporate Contribution) of MUR 1837. In his response to OGC, the contributor, Mr. M. N. Bostick, admitted that he was reimbursed by KWTX Company (A Texas corporation) for his $1,250 in contributions to the Committee. The auditors determined that the 2 contributions were from one check deposited October 11, 1984 in the amount of $1,250. No further information was available regarding any reimbursement to the contributor by KWTX Company.

F. Omission of Disclosure Information - Individual Contributions

Section 434(b)(3)(A) of Title 2, United States Code, states, in part, that each report shall disclose the identification of each person whose contribution or contributions have an aggregate amount or value in excess of $200 within the calendar year, together with the date and amount of any such contribution.

Section 431(13)(A) of Title 2, United States Code, states that the term "identification" means, in the case of any individual, the name, the mailing address, and the occupation of such individual, as well as the name of his or her employer.

Section 432(i) of Title 2, United States Code states, in part, that when the treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit the information required by the Act for the political committee, any report of such committee shall be considered in compliance with the Act.

In addition, 11 C.F.R. § 104.7(b) states, in part, that with regard to reporting the identification of each person whose contribution(s) to the committee aggregate in excess of $200 in a calendar year, the treasurer will not be deemed to have exercised best efforts to obtain the required information unless he or she

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has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain such information from the contributor.

The Committee's contribution records were reviewed to determine if the required disclosure information for contributions from individuals was disclosed properly on the Committee's reports. This review involved the comparison of information per the contribution records with the information disclosed on both the original reports filed with the FEC and amended reports filed August 1, 1985.

1. Disclosure Information

Our review, conducted on a sample basis, indicated that with respect to original reports filed, the Committee failed to include all required information. However, the amended reports filed materially corrected the aforementioned differences noted regarding the original reported entries.

2. Occupation/Name of Employer

Our review, conducted on a sample basis, indicated that with respect to both original and amended reports, the Committee failed to disclose the required occupation/name of employer information. Based on a review of the Committee's solicitation materials, the Audit staff concludes that the Committee has demonstrated best efforts to obtain the missing occupation/name of employer information.

3. MUR Items

The Audit staff reviewed the available records relative to contributors identified in Section I (Apparent Violations), Part 6 (Failure to Correctly Report Contribution Information) of MUR 1837. As a result of this review, the Audit staff included the following contributors in the Schedules of Apparent Excessive Contributions:

G. W. Sanford, Jr.
Peter Gill
William Burford
Thomas Hartin
Don Lummus
R. L. Foree
David Rogers (Anita)
Mary Crowley (David)
Michael Hutchinson
Arthur Cary
Doug Conlee

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Our review indicated that the disclosure information relative to the following contributors were corrected on the amended reports:

B. S. Baker
Gene Overbeck
Daniel Parker
G. W. Sanford, Sr.
The Nat'l Home Builders PAC
Mrs. Andrew Fasken
National Federation Ind. Bus.
William Martin

In addition, the disclosure information relative to Arthur Seeligson, III and Arthur Seeligson, Jr. are still incorrect. Also, the Committee's amended reports reflect Ross Workman as having made a $1,000 contribution to the general election and a $50 contribution to the primary. The contribution records provided indicate that Mr. Workman is the Vice President - Governmental Affairs for Transco Energy Co. PAC. Contribution records indicate the contribution source as from "Oil Industry Service Co. Executives." A copy of the contributor check was not available for review.

G. <u>House Transfer</u>

Section 441a(a)(1)(A) of Title 2, United States Code states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000.

Prior to the inception of the Friends of Phil Gramm (Senate Committee), the Committee to Re-elect Phil Gramm (House Committee) registered with the U.S. House of Representatives (1/11/83) as Phil Gramm's principal campaign committee for the February 12, 1983 special election (6th District-TX). On July 1, 1983, the House Committee terminated by transferring all its remaining funds ($337,327) to the Senate Committee.

Based on precedent set and reinforced in Advisory Opinions 1977-24, 1977-29, 1978-37, 1980-30, 1980-32, 1980-60, 1980-143, 1981-9, 1982-39, 1984-32, and 1985-5, the contributions received by the House Committee subsequent to the special election are subject to the 2 U.S.C. § 441a(a) limitations for the Senate Committee (See 11 C.F.R. § 110.3(a)(2)(iv)).

Conversely, unused funds comprised of contributions received on or before the date of the special election are considered as excess campaign funds of the House Committee and may be transferred to the Senate Committee. In a case where a transfer (or portion thereof) is comprised of excess campaign funds, the

limitations of 2 U.S.C. 441a(a) are not applicable (See generally 11 C.F.R. § 110.3(a)(2)(iii)).

The Committee provided contribution records for $59,683.46 of contributions received by the House Committee after the special election. The Audit staff determined that deposits made to the House Committee's bank account after the special election totaled $265,762.22 (2/14/83 - 6/30/83). According to the Committee representative who provided these records to the auditors, only $59,683.46 of the total deposits made after the special election were contributions received by the House Committee after the special election. He explained that the House Committee experienced a delay in depositing contributions received just prior to the special election because of the deluge of contributions received at that time.

The Audit staff determined that deposits made to the House Committee's bank account during the week after the special election totaled $227,648.22 (2/14/83 - 2/18/83). If the auditors had been given access to the contributor checks deposited between 2/14/83 and 2/18/83, they could have verified the Committee's assertion that the contributions were received before the special election, and thus classifiable as excess campaign funds.

The Audit staff requested the Senate Committee to determine the feasibility of obtaining photocopies of these checks from the bank. A representative of the Senate Committee responded by telephone on 9/19/86 that 1) the bank has a microfilm record of these contributor checks; 2) to retrieve copies would cost between $400 - $600 and would take the bank about 2 weeks; and 3) the Senate Committee will not pay for the copies.

Alternatively, the Senate Committee offered to provide an affidavit. The affidavit would attest to the delay in depositing contributions received just prior to the special election. The Audit staff can only render a qualified opinion since substantive documentary evidence was not provided.

On November 13, 1986, the Commission approved a subpoena requesting photocopies of all contributor checks deposited between 2/14/83 and 2/18/83 into the House Committee's bank account. On January 13, 1987, a shipment of check copies was received by OGC and provided to the Audit staff that same day.

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The Audit staff determined that although deposits between 2/14/83 and 2/18/83 into the House Committee's bank account totaled $227,648.22, legible check copies provided totaled $194,249.80 (a difference of $33,398.42 or 14.67%).*/

Based on our review of the check copies provided, the auditors determined that checks totaling $5,003 were dated after 2/12/83, the date of the special election. The $5,003 of check copies accounts for 2.58% of the dollar total of legible check copies provided.

The Audit staff concludes that, based on our review of the check copies, the dollar percentage of check copies dated after the date of the special election is immaterial. Therefore, the Committee's assertion that the contributions deposited between 2/14/83 and 2/18/83 into the House Committee's bank account were received before the special election and, thus, are classifiable as excess campaign funds, is valid.

However, should OGC decide to obtain the missing check copies ($33,398.42 or 14.67% of the total of deposits for the period) for our review, the results of such review will be analyzed in conjunction with our initial review. If the missing records are not pursued, we recommend no further action with respect to the $5,003 in contributions made by check and received after the special election.

H. Itemization of Expenditures

Section 434(b)(5)(A) of Title 2, United States Code, requires that a political committee itemize the name and address of each person to whom an expenditure in an aggregate amount or value in excess of $200 within the calendar year is made, together with the date, amount and purpose of such expenditure.

The Committee's disbursement records were reviewed to determine whether all expenditures requiring itemization were itemized on the Committee's disclosure reports. This review involved the comparision of information per the expenditure records with the information disclosed on both the original reports filed with the FEC and the amended reports filed August 1, 1985.

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*/ It should be noted that 57 of the checks provided were illegible and therefore excluded from our review.

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Our review, conducted on a sample basis, indicated that with respect to original reports filed, the Committee failed to correctly itemize all expenditures requiring itemization. However, the amended reports filed materially corrected the aforementioned differences.

The Audit staff also reviewed each of the items mentioned in Section I (Apparent Violations), Part 2 (The Committee's Failure to Report Expenditures) of MUR 1837. We determined that all items mentioned were corrected on the amended reports.

Our analysis indicated that the Committee's failure to correctly itemize expenditures relative to the original reports, as well as irregularities mentioned in MUR 1837 were, in large part, due to the Committee's practice of 1) itemizing two or more disbursements to the same vendor as one disbursement, and 2) itemizing disbursements to credit card companies without providing memo entries listing the ultimate payees (i.e., the actual provider of the goods and/or services). These expenditure reporting problems were rectified on the amended reports.

I. Checks Paid on Insufficient Funds

Section 441b(a) of Title 2 of the United States Code states, in part, that it is unlawful for any national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with any election to any political office.

11 C.F.R. § 100.7(b)(11), states, in part, that an overdraft made on a checking or savings account shall be considered a contribution by the bank or institution unless: the overdraft is made on an account which is subject to automatic overdraft protection; the overdraft is subject to a definite interest rate which is usual and customary; and there is a definite repayment schedule.

The Committee maintained primary and general election operating accounts at the First City National Bank of Bryan. During the audit the Audit staff noted that 27 checks, totaling $39,800.34, were drawn on the Committee's primary account when there were insufficient funds in the account to pay these checks. Nevertheless, these overdrawn checks cleared the primary account between 5/22/84 and 5/30/84. However, the net balance of the two checking accounts at this bank was in an overdrawn status only on 5/23/84 in the amount of ($11,136.94).

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The Audit staff further noted that the bank assessed a $12.50 service charge for 18 of the 27 above mentioned checks which indicates that the primary account was not subject to automatic overdraft protection. Based on our analysis of the records made available, it does not appear that the overdrafts were subjected to a definite interest rate. Further, there was no evidence that a definite repayment schedule was in effect. However, as previously noted, the net overdrawn status of the two accounts only existed for one day.

When the overdrafts were discussed with a Committee representative, he stated that he was unaware of this situation and that he was planning to research it.

See Attachment H for schedule of checks paid on insufficient funds.

J. Timely Deposit of Contributions from Political Committees

Section 432(b)(1) of Title 2, United States Code, and 11 C.F.R. § 102.8(a), requires that every person who receives a contribution for an authorized political committee shall, no later than 10 days after receipt, forward such contribution to the treasurer.

In addition, Section 103.3(a) of Title 11, Code of Federal Regulations, states, in part, that all receipts shall be deposited in account(s) within 10 days of the treasurer's receipt.

The Committee's contribution records were reviewed to determine whether contributions received from political committees were deposited in a timely manner. The results of testing these contributions on a sample basis indicated that 23.24% of the items tested were not deposited timely, as required. */ The explanation provided by a Committee representative was that contributions from political committees

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*/ Our testing relative to contributions received from individuals indicated that deposits were made in a timely manner.

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were received in Washington, D.C. and in various locations in Texas, and when finally received at the Committee's headquarters, were probably held for an additional 10 days prior to being deposited.

It is the opinion of the Audit staff that the Committee implement procedures to ensure that contributions received from political committees are deposited in a timely manner.

K. Joint Fundraising Committee

Background

The Committee participated in a joint fundraising event with the Texas Victory '84 Fund */, Republican Host Committee **/ and National Republican Senatorial Committee (NRSC). The event, known as the Presidential Nomination Breakfast Ball (PNBB), was held on August 23, 1984 in Dallas, Texas.

The written agreement entered into by the participating committees states that individual tickets for this event cost $1,500 per person with $1,000 going to Friends of Phil Gramm and $250 each to Texas Victory '84 Fund and Republican Host Committee. The agreement provided that if a contributor reached his/her contribution limit to a single committee, the funds were to be distributed equally to the remaining committees. The agreement added that when contributors reached their limit with respect to Friends of Phil Gramm, the first $1,000 (or portion thereof) was to go to the NRSC for the individual's membership in the Inner Circle program. The agreement also stated that expenses for the event were to be shared proportionately to income [funds] received.

Although the fundraising representative is not identified in the agreement, John Baxter, the treasurer of Friends of Phil Gramm, was named treasurer of the PNBB.

A copy of the written agreement and PNBB invitation is attached (Attachment I).

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*/ An account/activity of the Texas Republican Congressional Committee.

**/ An arm of the Dallas County Republican Party.

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A separate bank account was established for the event on July 25, 1984 and remained active until April 30, 1985.

1. Misallocation of Proceeds

Section 102.17 (c)(6)(i) of Title 11, Code of Federal Regulations, states, in part, that the fundraising representative shall allocate proceeds according to the formula stated in the fundraising agreement. Under 11 C.F.R. § 102.17(c)(7)(i)(A), after gross contributions are allocated among the participants, the fundraising representative shall calculate each participant's share of expenses based on the percentage of the total receipts each participant had been allocated.

Based on our review of the PNBB records and Friends of Phil Gramm records, the Audit staff determined that gross proceeds received relative to the PNBB totaled $645,320.61 */. The Committee calculated gross proceeds received by PNBB to be $613,977.11. The difference ($31,343.50) was due to $28,343.50 of contributions deposited directly into a Friends of Phil Gramm bank account and a $3,000 contribution also deposited directly into a Friends of Phil Gramm bank account, and subsequently transferred to the PNBB account, but not included in the Committee's calculation of gross proceeds. A Committee representative acknowledged that the Committee was aware that some contributions were deposited in a Friends of Phil Gramm account. However, the Committee did not include any of these contributions in their calculation relative to the distribution of proceeds.

Each participant's share of expenses, based on the percentage of the total receipts allocable to each participant, was calculated as follows:

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*/ This excludes contribution refunds totaling $10,500.

	Friends of Phil Gramm	Texas Victory '84 Fund	Republican Host Committee	NRSC	Total
Gross Proceeds					
As Allocated by Committee	$406,270.61 1/	$113,525.00	$113,525.00	$ 12,000.00	$645,320.61
Audit Allocation 2/	395,803.88	118,758.36	118,758.37	12,000.00	645,320.61
	(61.330)	(18.409)	(18.409)	(1.869)	
Difference - Over (Under)	10,466.73	(5,233.36)	(5,233.37)	- 0 -	- 0 -
Operating Expenditures					
As Calculated by Committee	125,907.48 3/	23,901.82	21,529.99	2,731.50	174,070.79
Audit Calculation 4/	106,764.58	32,034.25	32,034.24	3,237.72	174,070.79
Difference - Over (Under)	19,142.90	(8,132.43)	(10,504.25)	(506.22)	- 0 -
Less:					
Difference - Gross Proceeds	10,466.73	(5,233.36)	(5,233.37)	- 0 -	- 0 -
Over (Under) Absorption of Operating Expenditures	8,676.17	(2,899.07)	(5,270.88)	(506.22)	- 0 -

1/ Includes $31,343.50 in proceeds not recognized as proceeds by the Committee (Deposited directly by Friends of Phil Gramm).

2/ Includes allocation of $31,343.50 noted in footnote 1/.

3/ Includes $4,000 in operating expenditures not recognized as such by the Committee.

4/ Determined by applying percentages of Audit Allocation relative to Gross Proceeds to Total Operating Expenditures.

Based on the above figures, Friends of Phil Gramm paid $8,676.17 more in expenditures than their allocated share. The Audit staff determined that the other participants share of expenditures was absorbed by Friends of Phil Gramm as follows:

Texas Victory '84 Fund	$2,899.07
Republican Host Committee	5,270.88
NRSC	506.22
Total	$8,676.17

Therefore, the Friends of Phil Gramm should seek reimbursements from the other participants in these amounts.

A Committee representative explained that Friends of Phil Gramm deposited some contributions to compensate for disbursements paid directly by Friends of Phil Gramm. Huckaby and Associates included $37,582.75 of disbursements paid by Friends of Phil Gramm in their calculation relative to the distribution of proceeds. The auditors noted $41,582.75 of these disbursements. The Audit staff further noted that included in the $41,582.75 figure were start-up costs paid for by Friends of Phil Gramm totaling $31,556.54 */.

2. Failure to Report Joint Fundraising Activity

Section 102.17 (a)(1)(i) of Title 11, Code of Federal Regulations, states, in part, that the participants in a joint fundraising effort under this section shall either establish a separate committee or select a participating committee to act as fundraising representative for all participants.

Section 102.17 (c)(8)(i)(A) and (ii) of Title 11, Code of Federal Regulations, states, in part, that for all joint fundraising activity conducted under this section, the fundraising representative shall report all funds received in the reporting period in which they are received and all disbursements in the reporting period in which they are made.

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*/ No material amount of excessive contribution(s) to the other participants resulted.

The Regulations at 11 C.F.R. § 102.17 (c)(8)(i)(B) state, in part, that after distribution of net proceeds, each participating political committee shall report its share of net proceeds received as a transfer-in from the fundraising representative.

The Audit staff determined that gross proceeds relative to the PNBB totaled $655,820.61.*/ Of this amount, $627,477.11 was deposited into the account established for the event and the remainder ($28,343.50) was deposited into a Committee account. It was further noted that disbursements relative to the PNBB totaled $669,059.86. Of this amount, $627,477.11 was paid from the account established for the event and the remainder ($41,582.75) was paid from a Committee account.

None of the joint fundraising activity was identified as such until August 1, 1985 when the Committee filed amendments for the entire audit period as a result of work performed by Huckaby and Associates. Memo schedules filed with these amendments disclosed contributions to the PNBB which were allocated, all, or in part, to Friends of Phil Gramm, as well as memo schedules disclosing $627,477.11 of both gross joint fundraiser receipts and disbursements.

These amendments included the disclosure of the Committee's share of the net proceeds received as a transfer-in in the amount of $316,131.30 and deposited 9/24/84. It should be noted that on the FEC reports filed prior to these amendments, it appears that the contributions comprising the Committee's share of net proceeds were disclosed as if received directly by the Committee - no transfer-in was disclosed.

In summary, the Committee, as the fundraising representative for the PNBB, initially failed to report $655,820.61 in gross proceeds and $669,059.86 in disbursements. On August 1, 1985, amendments were filed which disclosed gross proceeds of $627,477.11 and disbursements of $627,477.11. The gross proceeds were understated by $28,343.50, the amount of contributions deposited directly into the Committee's account. The disbursements were understated by $41,582.75, the amount of disbursements paid from the Committee's account.

In addition, the Committee failed to report its share of net proceeds received as a transfer-in ($316,131.30), and deposited on 9/24/84, until 8/1/85 when the amendments were filed.

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*/ See footnote on page 25.

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3. Fundraising Notice

Section 441a(a)(1)(A) of Title 2 of the United States Code states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000.

Section 102.17(c)(2)(i) of Title 11, Code of Federal Regulations, states, in part, that a joint fundraising notice shall be included with every solicitation for contributions and this notice shall include the following information:

- The names of all committees participating in the joint fundraising activity.
- The allocation formula to be used for distributing joint fundraising proceeds.
- A statement informing contributors that, notwithstanding the stated allocation formula, they may designate their contributions for a particular participant or participants.
- A statement informing contributors that the allocation formula may change if a contributor makes a contribution which would exceed the amount that contributor may give to any participant.

The Audit staff examined the solicitation materials provided relative to the PNBB. The required fundraising notice did not include a statement informing contributors that they could have designated their contribution(s) for a particular participant, nor did it inform contributors that the allocation formula may change if any contributor made a contribution that exceeded his/her singular limit to any participant.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachments to the 2/9/87 Audit Report have been deleted from Summary File.

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Phil Gramm
United States Congress

ATTACHMENT A
1 of 2

May 29, 1985

Mrs. Katherine Miller Walker
3711 San Felipe, #11-C
Houston, TX 77027

Dear Katherine:

Thank you for your generous contributions to the Friends of Phil Gramm during the 1984 campaign for the U. S. Senate.

Because the total of your contributions exceeds the amount which one individual can give, we have allocated a portion of your total contributions to your spouse.

Although the allocations were made according to your instruction, the Federal Election Commission has notified us that checks that do not contain both signatures require us, for allocation purposes, to obtain written documentation of the allocation and both signatures.

In order that we may comply with the strict regulations of the Federal Election Campaign Act, we need you and your spouse to sign the attached form, and return it to us in the enclosed envelope as soon as possible.

Thank you for your assistance in this important matter. If you have any questions, please do not hesitate to contact Keith Davis, the representative from our C.P.A. firm, at (214) 630-1727.

Sincerely,

John P. Baxter

John P. Baxter
Treasurer
Friends of Phil Gramm

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds
to elect Phil Gramm to the United States Senate

8 9 0 4 0 7 4 4 1 9 7

1(3)

Mrs. Katherine Miller Walker
3711 San Felipe, #11-C
Houston, TX 77027

ATTACHMENT A
2 of 2

DATE	AMOUNT	CONTRIBUTOR	RACE
84/05/10	1,000.00	Katherine	GENERAL
84/08/14	1,000.00	Edward	GENERAL
84/08/14	1,000.00	Katherine	PRIMARY

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To whom it may concern:

We hereby authorize the above allocations of our contributions to the Friends Of Phil Gramm:

Signed: _____

(Please Print) _____

Signed: _____

(Please Print) _____

Mr. J. G. Walker, Jr.
P. O. Box 6928
Tyler, TX 75701

To whom it may concern:

I hereby authorize the Friends of Phil Gramm to allocate $ 1,000.00 of my total contributions to Senator Gramm's next primary race.

Signed: _____

(Mr. J. G. Walker, Jr.)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachments C thru I to 2/9/87 Audit Report have not been included in Public Record.

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: OCTOBER 19, 1987

SUBJECT: OBJECTIONS TO MUR 1837 - General Counsel's Report Signed October 14, 1987

The above-captioned document was circulated to the Commission on Thursday, October 15, 1987 at 4:00 P.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	
Commissioner Elliott	X
Commissioner Josefiak	X
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	X

This matter will be placed on the Executive Session agenda for October 27, 1987.

Please notify us who will represent your Division before the Commission on this matter.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: OCTOBER 19, 1987

SUBJECT: COMMENTS TO MUR 1837 - General Counsel's Report
Signed October 14, 1987

Attached is a copy of Commissioner Thomas's vote sheet with comments regarding the above-captioned matter.

Attachment:
copy of vote sheet

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BALLOT

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: THURSDAY, OCTOBER 15, 1987 4:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEFIAK, McDONALD, McGARRY, THOMAS

RETURN TO COMMISSION SECRETARY BY MONDAY, OCTOBER 19, 1987 4:00

SUBJECT: MUR 1837-General Counsel's Report
signed October 14, 1987

RECEIVED
FEDERAL ELECTION COMMISSION
87 OCT 19 AM 11:32

( ) I approve the recommendation

(✓) I object to the recommendation

COMMENTS: Discussion.

DATE: 10/19/87 SIGNATURE [signature]

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.

8 2 0 4 0 7 4 4 2 0 3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

OFFICE OF THE CHAIRMAN

87 OCT 23 PM 5:21

FEDERAL ELECTION COMMISSION

MEMORANDUM

TO: MARGE EMMONS
SECRETARY TO THE COMMISSION

FROM: SCOTT E. THOMAS
CHAIRMAN

SUBJECT: WITHDRAWAL OF OBJECTIONS IN
MURS 1837 & 2071

DATE: OCTOBER 23, 1987

I hereby withdraw my objection to and cast my votes in favor of the General Counsel's recommendations in MUR 1837 and MUR 2071,

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Friends of Phil Gramm and John Baxter, as treasurer	)	MUR 1837
	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 27, 1987, do hereby certify that the Commission took the following actions in connection with the General Counsel's October 17, 1987, report on MUR 1837:

1. Decided by a vote of 4-0 to take no action with that portion of recommendation number one to find reason to believe that the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441a(a)(1)(C).

   Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision. Commissioners McDonald and Thomas were not present.

(continued)

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2. Decided by a vote of 4-0 to find reason to believe that the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 103.3, as noted in recommendation number one of the General Counsel's report.

   Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision; Commissioners McDonald and Thomas were not present.

3. Decided by a vote of 4-0 to find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441b(a) regarding receipt of prohibited corporate contributions as noted in recommendation number one of the General Counsel's report.

   Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision; Commissioners McDonald and Thomas were not present.

4. Failed in a vote of 2-2 to pass a motion to eliminate the language in the General Counsel's recommendation number one with respect to "overdrafts paid from the Committee's primary account," in connection with the finding of 2 U.S.C. § 441b(a).

   Commissioners Aikens and Elliott voted affirmatively for the motion; Commissioners Josefiak and McGarry dissented; Commissioners McDonald and Thomas were not present.

(continued)

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5. Failed in a vote of 3-1 to pass a motion to take the following actions:

a) Enter into conciliation prior to a finding of probable cause to believe with the Friends of Phil Gramm and John Baxter, as treasurer, as noted in recommendation number two of the General Counsel's report.

b) Take no action with respect to recommendation number three in the General Counsel's report to find reason to believe the First City National Bank of Bryan, Texas, violated 2 U.S.C. § 441b(a).

c) Direct the Office of General Counsel to appropriately amend the conciliation agreement, factual and legal analyses, and letters attached to the General Counsel's report, based on the actions taken by the Commission on this date.

Commissioners Aikens, Elliott, and McGarry voted affirmatively for the motion; Commissioner Josefiak dissented; Commissioners McDonald and Thomas were not present.

(continued)

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6. Decided by a vote of 4-0 to return MUR 1837 to the Office of General Counsel for revision of the factual and legal analyses based on the actions taken by the Commission at this meeting.

Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision; Commissioners McDonald and Thomas were not present.

Attest:

10-28-87
Date

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

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SENSITIVE

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FEDERAL ELECTION COMMISSION
SECRETARIAT

87 NOV 25 PM 3:42

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Friends of Phil Gramm) MUR 1837
and John Baxter, as treasurer)

EXECUTIVE SESSION

DEC 08 1987

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 27, 1987, the Commission considered the recommendations in the General Counsel's Report dated October 14, 1987, in the above captioned matter. The Commission determined to take no action with respect to the General Counsel's recommendation to find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, ("the Committee") violated 2 U.S.C. § 441a(a)(1)(C). Additionally, the Commission determined to find reason to believe the Committee violated 11 C.F.R. 103.3 and 2 U.S.C. § 441b(a). This latter determination related to the receipt of prohibited corporate contributions. Also on that date, the Commission failed by a vote of 2 to 2 to pass a motion to eliminate the language in the General Counsel's recommendation number one with respect to overdrafts paid from the Committee's primary account. The Commission also failed to pass a motion to take the following actions: enter into preprobable cause conciliation with the Committee; take no action as to the General Counsel's recommendation to find reason to believe the First City National Bank of Bryan, Texas, violated 2 U.S.C. § 441b(a); and to direct the Office of the General Counsel to appropriately amend the conciliation agreement, factual and legal analyses, and letters. The Commission did,

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however, determine to return MUR 1837 to the Office of the General Counsel for revision of the factual and legal analyses based on the actions taken by the Commission at its meeting.

Accordingly, attached for Commission approval are factual and legal analyses, proposed letters, and a proposed conciliation agreement. Consistent with the Commission's determinations, references in these documents to possible violations of 2 U.S.C. § 441a(a)(1)(C) have been deleted. Moreover, because with only four members present and voting the Commission failed to make determinations regarding: a violation by the Committee of section 441b(a) resulting from payment of overdrafts by the Committee's primary account; pre-probable cause conciliation, and a possible violation of 2 U.S.C. § 441b(a) by the First City National Bank of Bryan, Texas, this report repeats these recommendations for consideration by the Commission.

RECOMMENDATIONS

1. Find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441b(a) regarding overdrafts paid from the Committee's primary account.

2. Enter into conciliation prior to a finding of probable cause to believe with the Friends of Phil Gramm and John Baxter, as treasurer.

3. Find reason to believe the First City National Bank of Bryan, Texas, violated 2 U.S.C. § 441b(a).

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4. Approve the attached letters, factual and legal analyses */ and conciliation agreement.

11/25/87
Date

Lawrence M. Noble
General Counsel

Attachments
Certification
Proposed Letters (2)
Factual and Legal Analyses (2)
Conciliation Agreement

*/ As previously noted in the prior General Counsel's report in this matter, in order to avoid needless duplication, the Committee's attached proposed factual and legal analysis does not contain attachments C, D, F and G to the audit report. These will be provided to the Committee as part of the factual and legal analysis.

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/SUSAN GREENLEE S.G

DATE: NOVEMBER 30, 1987

SUBJECT: OBJECTION TO MUR 1837: General Counsel's Report signed November 25, 1987

The above-captioned document was circulated to the Commission on Friday, November 27, 1987 at 12:00 P.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens _____
Commissioner Elliott X
Commissioner Josefiak _____
Commissioner McDonald _____
Commissioner McGarry _____
Commissioner Thomas _____

This matter will be placed on the Executive Session agenda for December 8, 1987.

Please notify us who will represent your Division before the Commission on this matter.

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /JOSHUA MCFADDEN

DATE: DECEMBER 1, 1987

SUBJECT: OBJECTIONS TO MUR 1837 - General Counsel's Report Signed November 25, 1987

The above-captioned document was circulated to the Commission on Friday, November 27, 1987 at 12:00 P.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	X
Commissioner Elliott	X
Commissioner Josefiak	X
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the Executive Session agenda for December 8, 1987.

Please notify us who will represent your Division before the Commission on this matter.

9904074421 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Friends of Phil Gramm and John Baxter, as treasurer	)	MUR 1837
	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 8, 1987, do hereby certify that the Commission took the following actions in MUR 1837:

1. Failed in a vote of 3-3 to pass a motion to

   a) Take no action with respect to recommendation number 1 in the General Counsel's November 25, 1987 report regarding overdrafts paid from the Committee's primary account.

   b) Enter into conciliation prior to a finding of probable cause to believe with the Friends of Phil Gramm and John Baxter, as treasurer.

   c) Take no action with respect to recommendation number 3 in the General Counsel's November 25, 1987 report.

   d) Direct the General Counsel to send an appropriate conciliation agreement

(continued)

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e) Direct the Office of General Counsel to send appropriate letters and factual and legal analyses.

Commissioners McDonald, McGarry, and Thomas voted affirmatively for the motion; Commissioners Aikens, Elliott, and Josefiak dissented.

2. Decided by a vote of 6-0 to take the following actions in MUR 1837:

a) Take no action with respect to recommendation number 1 in the General Counsel's November 25, 1987 report regarding overdrafts paid from the Committee's primary account.

b) Enter into conciliation prior to a finding of probable cause to believe with the Friends of Phil Gramm and John Baxter, as treasurer.

c) Take no action with respect to recommendation number 3 in the General Counsel's November 25, 1987 report.

d) Direct the General Counsel to send an appropriate conciliation agreement

(continued)

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e) Direct the Office of General Counsel to send appropriate letters and factual and legal analyses.

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

Attest:

12-9-87
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 29, 1987

James F. Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 15th Street, N.W.
Washington, D.C. 20006

Re: MUR 1837
Friends of Phil Gramm and
John Baxter, as treasurer

Dear Mr. Schoener:

On March 5, 1985, the Federal Election Commission found reason to believe your clients violated a number of provisions of the Act, as well as a provision of the Commission's Regulations. Specifically, the Commission found reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, ("the Committee") violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), 434(b)(3)(A), and 11 C.F.R. § 102.17. Additionally, on that date the Commission found no reason to believe your clients violated 2 U.S.C. §§ 441b and 441f. A Factual and Legal Analysis indicating the basis for the Commission's findings was also provided on that date. You were also notified on March 5, 1985, that the Commission had authorized an audit of your clients pursuant to 2 U.S.C. § 437g(a)(2), and had declined at that time to enter into pre-probable cause conciliation negotiations with your clients.

On October 27, 1987, and December 9, 1987, following the completion of the audit, the Commission made a number of other determinations in this matter. First, based upon new evidence discovered in the course of the audit, the Commission determined that your clients violated 2 U.S.C. § 441b(a) by accepting prohibited corporate contributions. The Commission also determined that there is reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 103.3(a) by failing to deposit contributions from political committees in a timely manner. Finally, although the Commission

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did not make any further determinations regarding its previous findings of violations of 2 U.S.C. §§ 441a(f), 434(b)(8), 434(b)(5)(A) and 434(b)(3)(A) and 11 C.F.R. § 102.17, there appears to be additional evidence supporting these reason to believe findings. Therefore, the attached Factual and Legal Analysis, which formed a basis for the Commission's most recent findings, also details the additional evidence supporting the other possible violations of which you were previously notified.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath.

Also on December 8, 1987, the Commission considered your prior request to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe and determined to grant this request.

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 Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Scott E. Thomas
Chairman

Enclosures
Factual and Legal Analysis
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondents: Friends of Phil Gramm and John Baxter, as treasurer

MUR: 1837
Staff Member & Telephone: Number: Patty Reilly 376-8200

This matter arose from a complaint filed on October 30, 1984, by Ms. Donna Mobley of Austin, Texas, against The Friends of Phil Gramm, and John Baxter, as treasurer ("the Committee") and 170 other persons. On March 5, 1985, the Commission found reason to believe the Committee violated 2 U.S.C. § 434(b)(8), 434(b)(5)(A), 441a(f), 434(b)(3)(A), as well as, 11 C.F.R. § 102.17. Additionally, on that date, the Commission found no reason to believe the Committee violated 2 U.S.C. §§ 441b and 441f in connection with the possible acceptance of a corporate contribution made in the name of another. The Commission also authorized an audit of the Committee pursuant to 2 U.S.C. § 437g(a)(2), and denied Committee's request for pre-probable cause conciliation at that time. This Factual and Legal Analysis provides a detailed account of the Commission's new reason to believe determinations, as well as expands the scope of previously made reason to believe determinations.

A. Excessive Contributions

The Commission found reason to believe that the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441a(f) by both accepting facially excessive contributions and by improperly designating contributions.

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Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate or his authorized committee with respect to any election for federal office which, in the aggregate, exceed $1,000. Contributors may designate contributions for a particular election, but a contribution made after a primary election may only be designated for the primary election provided the committee has a primary debt. 11 C.F.R. § 110.1(a)(2)(i).1/ When a contribution is not designated in writing for a particular election and is made prior to the primary, such contribution is a primary contribution. Similarily, if such an undesignated contribution is made after the primary, such contribution is a general election contribution. 11 C.F.R. § 110.1(a)(2)(ii)(A) and (B). A contribution which represents contributions by more than one person shall indicate on the written instrument, or on an accompanying statement signed by all contributors, the amount to be attributed to each contributor. 11 C.F.R. § 104.8(d). Contributions made by a married individual shall not be

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1/ New regulations governing contribution limitations and prohibitions, and contributions by persons and multicandidate committees went into effect on April 8, 1987. This Factual and Legal Analysis cites to the regulations in effect at the time transactions at issue took place. The new requirements at 11 C.F.R. § 110.1 permit redesignation and reattribution of excessive contributions if a committee obtains such redesignation or reattribution within 60 days after the excessive contribution is received. Of the 874 excessive contributions identified in this matter, approximately 16 remained outstanding for less than 60 days.

attributable to that individual's spouse, unless otherwise specified by the individual or that individual's spouse. 11 C.F.R. § 100.7(c). Political committees are prohibited from accepting contributions exceeding the Act's limitations. 2 U.S.C. § 441a(f).

In the instant case, the auditor's review reveals 874 excessive contributions totalling $690,999.05. The names of these contributors are listed at Attachments C and D to this Factual and Legal Analysis. These excessives are divided into three main catagories. First, the auditors noted excessives resulting from inadequate documentation of an election designation. Such contributions are marked with an "A" on the attachments. Second, the auditors determined other contributions to be excessive because the Committee failed to obtain the signature of a purported contributor. These contributions are marked with a "B" on the attachments. Finally, other excessive contributions made by agents are noted with a "C" on the attachments. Some excessive contributions could not be attributed to any one of these codes; some excessives could be attributed to more than one code.

In light of the foregoing, it appears that there is reason to believe the Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions. Because the Commission has already made this finding regarding the Committee, no additional reason to believe finding is necessary.

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B. Failure to Report Outstanding Debts and Obligations

The Commission found reason to believe the Committee violated 2 U.S.C. § 434(b)(8) by failing to report its outstanding debts and obligations.[2/] The Act requires each report filed by the treasurer of a political committee to disclose the amount and nature of outstanding debts and obligations owed by the committee. 2 U.S.C. § 434(b)(8). The Commission's Regulations require debts and obligations to be continuously reported until extinguished. 11 C.F.R. § 104.11(a). Moreover, the Regulations require that debts of $500 or less shall be reported as of the time payment is made or no later than 60 days after the obligation is incurred and that debts in excess of $500 shall be reported at the time of the transaction. 11 C.F.R. § 104.11(b).

Based on the auditors' review, it appears that the Committee initially reported no debts, subsequently amended some of its reports (but not others) to indicate debts, and finally reported all required debts. The Audit staff determined that none of the

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2/ The Committee's original reports from its inception until the filing of the complaint never disclosed a single debt. The Committee's second response to the complaint stated it did not understand the definition of a debt, and thus did not report debts. Nevertheless, the Committee assured contributors making primary contributions after the date of the primary that it did have a debt.

debts and obligations owed by the Committee were disclosed on the original reports filed for the Committee's first six required reports. On December 17, 1984, as part of its response to the complaint, the Committee amended its 1984 July Quarterly, October Quarterly and Pre-General Reports, disclosing a total of $850,686.33 in previously undisclosed debts and obligations. On August 1, 1985, the Committee amended all reports included in the audit period to report debts of $1,182,192.02 for the first six reporting periods. The auditors note that they have adjusted this reportable debt figure down to $1,169,026.80. This amount includes $96,790.73 of recurring debts which are reportable on subsequent Schedule D's until extinguished; therefore, the auditors conclude that the Committee initially failed to disclose $1,072,266.07 in debts and obligations ($1,169,026.80 - $96,760.73) during the first six reporting periods. Because the Commission has already made a reason to believe determination regarding this apparent violation of Section 438(b)(8), no further recommendations are necessary.

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C. Primary Debt

The Commission's reason to believe determinations did not encompass possible violations surrounding allegations in the complaint that the Committee violated 2 U.S.C. § 441a(f) by accepting primary contributions after the date of the primary at a time when it lacked a primary debt. The Act prohibits persons from contributing more than $1,000 per election to an authorized committee of a candidate. 2 U.S.C. § 441a(a)(1)(A). An election

is defined as a general, special, primary, or runoff election. 2 U.S.C. § 431(1)(A). The Commission's Regulations provide that "with respect to any election" means in the case of a contribution designated in writing, the election so designated, except that a contribution made after a primary election and designated for the primary election shall be made only to the extent that the contribution does not exceed the debts outstanding from the primary election. 11 C.F.R. § 110.1(a)(2)(i). Political committees are prohibited from accepting contributions exceeding the Act's limitations. 2 U.S.C. § 441a(f). Thus, the Gramm Committee could accept the numerous contributions it received that were designated for the primary after the date of the primary only if it had a primary debt.

The auditors have concluded that, based on information provided by the Committee, it appears the Committee had sufficient primary debts to accommodate the Committee-generated Late Primary contributions total. Therefore, there does not appear to be violations of section 441a(f) from the Committee's acceptance of primary contributions after the date of the primary.

D. Prohibited Contributions

The Commission found no reason to believe the Committee violated 2 U.S.C. § 441b. Underlying this determination was the previously noted corporate contribution made in the name of another. Based on a review of the Committee's reports of

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refunds, the auditors found 151 apparent prohibited corporate contributions totalling $10,889.93. Of these, 127 contributions totalling $9,708 were found not to have been refunded within 30 days of deposit.[3/] Refunds were not made for most of these prohibited contributions until many months after the dates they were deposited. In some instances more than a year passed until refunds were made. Moreover, in another instance the Committee made a refund of an apparent corporate contribution, and voided this check when the contributor stated he had intended to write the check from a personal account rather than a corporate account. A listing of these contributions are contained at Attachments F and G to this Factual and Legal Analysis.

The Act prohibits corporations from making a contribution or expenditure in connection with any election. 2 U.S.C. § 441b(a). Political committees are prohibited from knowingly accepting such contributions. Id.

In the instant case the Committee accepted 151 prohibited contributions totalling $10,889.93. Of these, 127 contributions totalling $9,708 appeared not to have been refunded within thirty days. Therefore, this Office recommends that the Commission find that there is reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441b(a).

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3/ Excluded from this figure were 16 contributions whose original desposit dates are unknown, and thus it could not be determined whether timely refunds were made.

E. Omission of Disclosure Information

The Commission also found reason to belive the Committee and its treasurer violated 2 U.S.C. § 434(b)(3)(A). This section requires disclosure of the identification of persons whose contributions, in the aggregate, exceed $200. The auditors, on a sample basis, have reviewed the Committee's original reports in relation to contribution records and determined that the Committee had failed to include all required information, but that amended reports materially corrected these deficiencies. Additionally, the auditors' review, conducted on a sample basis, revealed, that on both the original and amended reports, the Committee had failed to disclose the required employer information. Based on a review of the Committee's solicitation materials, it appeared to the auditors that the Committee has demonstrated best efforts to obtain missing employer information.

The auditors examined specific reporting irregularities noted in the Factual and Legal Analysis in MUR 1837 regarding 22 contributors. The auditors included some of these noted contributors on the list of apparent excessive contributions.[4/] Information regarding the others was corrected on the amended reports filed by the Committee.[5/] Information disclosed on the

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4/ The contributors are: G.W. Sanford, Jr.; Peter Gill; William Burford; Thomas Hartin; Don Lummus; R.L. Foree; David Rogers (Anita); Mary Crowley (David); Michael Hutchinson; Arthur Cary; and Doug Conlee.

5/ These are: B.S. Baker; Gene Overbeck; Daniel Parker; G.W. Sanford, Sr.; The National Home Builders PAC; Mrs. Andrew Fasken; National Federation of Independent Businesses; and William Martin.

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Committee's amended reports regarding Arthur Seeligson, III, and Arthur Seeligson, Jr.; and Ross Workman is still incorrect.

Pursuant to 2 U.S.C. § 434(b)(3)(A), reports shall include the identification of each person (other than a political committee) who makes a contribution or contributions that exceed $200 to the reporting committee during the reporting period. Identification of an individual is defined as the name, mailing address, occupation and employer. 2 U.S.C. § 431(13)(A). When a treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit the information required by the Act for a political committee, any report of such committee shall be considered in compliance with the Act. 2 U.S.C. § 432(i). The Commission's Regulations state that, for reporting the identification of individuals, the treasurer will not be deemed to have exercised best efforts to obtain the required information unless he or she has made at least one effort per solicitation either by a written request or by an oral request documented in writing. 11 C.F.R. § 104.7(b).

In the instant case, the auditors state based on their sample review of disclosure information, that the Committee's amendments appear to have materially corrected the insufficient disclosure information noted in its the original reports. The auditors have also stated that the Committee appears to have satisified the Regulations' best efforts requirements regarding

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employer information and that most of the specific reporting problems noted in the General Counsel's Report appear to have been corrected. Nevertheless, incorrect and inaccurate contributor information was on the public record for more than a year. Thus, it is the opinion of this Office that violations of 2 U.S.C. § 434(b)(3)(A) should be pursued and thus are incorporated in the conciliation agreement.

F. The House Transfer

In order to address the accuracy of the Committee's initial cash on hand figure, the auditors examined the composition of a $337,327 transfer made to the Committee by the Senator's House Committee ("House Committee") on July 1, 1983. The House Committee was the Senator's authorized committee for a February 12, 1983, special election in the 6th District of Texas. Of this transferred amount, the auditors determined that $265,762.22 was deposited into the House Committee's bank account after the date of the February 12, 1983, primary, thus raising the possibility that funds received by the House Committee after the special election were included in the transfer.

Pursuant to 11 C.F.R. § 110.3(a)(2)(iv), transfers may be made between a candidate's previous campaign committee and his or her currently authorized committee, as long as the funds transferred do not contain contributions that would be in

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violation of the Act. See also 2 U.S.C. § 441a(a)(5)(C) and 11 C.F.R. § 110.3(a)(2)(v). The Commission has addressed such transfers between two authorized committees of a candidate in its advisory opinions and has determined that contributions received after the date of an election may be transferred subject to the limitations of 2 U.S.C. § 441a(a) as applied to the next election. Contributions received prior to an election, but which are not used, may be transferred as excess campaign funds outside the limitations of 2 U.S.C. § 441a(a). See Advisory Opinions 1977-24, 1977-29, 1978-37, 1980-30, 1980-32, 1980-60, 1980-143, 1981-9, 1982-39, 1984-32 and 1985-5.

In the instant case, the auditors determined that the House Committee made deposits totalling $265,762.22 into its account after the special election. The House Committee asserted, however, that only $59,683.46 of this amount was actually received after the date of the special election, and that the remainder of the amount transferred was deposited after the date of the special election due to the influx of contributions received immediately prior to the special election. Contribution

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records for the $59,683.46 were provided by the Committee as required.

The auditors received copies of the checks composing the House Committee's post-special election deposit in order to determine that these contributions were received after the special election and thus were classified properly as excess campaign funds.[6/] Their review determined that most of the checks deposited were received by the House Committee prior to the date of the special election. However, it appears that checks totalling $5,003 were dated after the date of the special election, and thus would be required to be transferred subject to the individual contributors' limits under 2 U.S.C. § 441a(a) for the 1984 Senate election. Because this amount constitutes only 2.58% of the amount contained on the legible check copies provided, it appears the House Committee's transfer contained primarily excess campaign funds, and thus, this Office makes no recommendations to the Commission regarding possible excessive contributions resulting from the House Committee's transfers.

G. Itemization of Expenditures

The Commission also found reason to believe the Committee violated 2 U.S.C § 434(b)(5)(A). This section requires a committee to report the name and address of each person to whom an expenditure in excess of $200 is made, together with the date,

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6/ Not all copies of these checks were provided by the First City National Bank of Bryan, Texas, and not all copies of the checks received were legible. The auditors were able to identify $194,249.80 in checks (or 84.5% of $227.648.22).

amount and purpose. The Commission made this finding because checks submitted by the Committee in an attempt to document a primary debt did not correlate with information on the Committee's reports on file with the Commission at that time.

The auditors reviewed the Committee's disbursement records in order to determine whether expenditures requiring itemization were itemized on the Committee's original reports. The auditors used a sample basis to compare the original reports with the August, 1985, amendments. The auditors determined that the Committee initially failed to itemize all expenditures requiring itemization. Based on this sample, however, the auditors state that the amended reports appear to materially correct these reporting problems. Moreover, the auditors report that specific reporting problems noted in the Factual and Legal Analysis at pages 1-5 have also been corrected on the amended reports. Notwithstanding the Committee's amendments, however, the public record remained incomplete from as early as January, 1984, when the Committee filed its 1983 Year End Report, until August, 1985, when the comprehensive amendments were filed. Therefore, it is the opinion of this Office that this reporting violation should also be pursued.

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H. Timely Deposit of Contributions from Political Committees

The auditors tested the Committee's deposits of contributions from political committees on a sample basis in order to determine whether such contributions were timely deposited. The Act requires that every person who receives a contribution for an authorized committee shall, no later than 10 days after receiving such contribution, forward this contribution to the treasurer. 2 U.S.C. § 432(b)(1) and 11 C.F.R. § 102.8(a). The Commission's Regulations require that the treasurer be responsible for making deposits of the receipts of a political committee and that all deposits shall be made within 10 days of the treasurer's receipt. 11 C.F.R. § 103.3(a).

The auditors' testing of the Committee's records revealed that contributions received from individuals were deposited in a timely manner, but 23.24% of the items tested for contributions from political committees were not deposited in a timely manner. Therefore, this Office recommends that the Commission find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 103.3(a).

I. Joint Fundraising Violations

The Commission also found reason to believe the Committee violated 11 C.F.R. § 102.17. Underlying this determination were responses to the complaint indicating the Committee had engaged

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in a joint fundraising event, when the Committee's reports did not reveal any joint fundraising activity. The audit revealed that the Committee did, indeed, participate in a joint fundraising event entitled the "Presidential Nomination Breakfast Ball" in August 1984. Participants in the fundraising were the Texas Victory '84 Fund,[7/] the Republican Host Committee[8/] and the National Republican Senatorial Committee. The Gramm Committee operated as the joint fundraising representative. Pursuant to a written fundraising agreement, the participants sold individual tickets to this event for $1,500, with $1,000 to be received by the Friends of Phil Gramm and $250 each to Texas Victory '84 and the Republican Host Committee. The agreement provided that when contributors reached his or her contribution limit for a single committee, the funds would be distributed equally to the remaining committees. The agreement added that when contributors reached their limit with respect to the Friends of Phil Gramm, the first $1,000 (or portion thereof) in ticket proceeds was to go to National Republican Senatorial Committee for the

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7/ The auditors identify this entity as an account/activity of the Texas Republican Congressional Committee, a federal political committee registered with the Commission.

8/ The auditors identify this entity as "an arm of the Dallas County Republican Party." Neither of these entities appear to be a registered political committee.

individuals' memberships in the the Inner Circle program. Expenses for the event were to be shared porportionate to income received and a separate bank account was established. As discussed below, the auditors isolated three problems with the Committees fundraising activity.

1. Misallocation of Proceeds

Pursuant to 11 C.F.R. § 102.17(a)(1) and (b)(2), political committees and other entities may conduct joint fundraising activity and may select one participant to act as joint fundraising representative. The fundraising representative must be a political committee and all contributions must be forwarded to the fundraising representative. 11 C.F.R. § 102.17(b)(2). The fundraising representative pays all fundraising costs from gross proceeds and advanced funds, and then disburses net proceeds to each participant. Id.

The Regulations further provide that the fundraising representative shall allocate proceeds according to the formula stated in the fundraising agreement. 11 C.F.R. § 102.17(c)(6)(i). In instances such as the one at hand, where the fundraising participants are not all affiliated political committees, gross proceeds are first allocated to the participants and the fundraising representative shall calculate

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each participant's share of expenses based on the percentage of the total receipts allocated to each. 11 C.F.R. § 102.17(c)(7)(i)(A). Net proceeds are reached by the fundraising representative's subtraction of each participant's share of expenses from the amount that participant has been allocated from gross proceeds. Id.

The auditors note that the Gramm Committee apparently failed to meet the Regulations' requirements. First, the auditors' review reveals the Committee miscalculated its gross proceeds as $613,997.11 instead of $645,320.61.[9/] This incorrect gross proceeds figure thus affected the allocation of operating expenses (which are based on the percentage of total receipts allocated to each participant). This, in turn, resulted in the Gramm Committee having paid a greater share of the fundraiser's operating expenditures than appropriate ($8,676.17), and the Texas Victory '84 Fund, the Republican Host Committee and the NRSC having underpaid by $2,899.07, $5,270.88 and $506.22, respectively. Therefore, it appears the Committee failed to meet the requirements of 11 C.F.R. § 102.17(c)(7)(i)(A).

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9/ As discussed in subsection two, this error occurred because the Gramm Committee accepted $31,343.50 in gross proceeds into its own account instead of the fundraising account.

2. Failure to Report Joint Fundraising Activity

The Commission's Regulations also include reporting requirements ~~for~~ committees engaging in joint fundraising activity. As previously noted, fundraising entities must establish a separate depository account, and all joint fundraising proceeds must be deposited into this account within ten days of receipt. 11 C.F.R. § 102.17(c)(3)(ii). The fundraising representative shall report all funds received in the reporting period in which they are received. 11 C.F.R. § 102.17(c)(8)(i)(A). Additionally, each Schedule A filed by the fundraising representative shall clearly indicate that the contributions reported on that schedule are joint fundraising proceeds. Id. Following distribution of the net proceeds, each participating political committee shall report its share of net proceeds received as a transfer-in from the fundraising representative. 11 C.F.R. § 102.17(c)(8)(i)(B). Each participating political committee shall also file a memo Schedule A itemizing its share of gross receipts as contributions from those original contributors whose aggregate contributions exceed $200 per contributor. Id. Finally, the fundraising representative shall report all disbursements in the reporting period in which they are made. 11 C.F.R. § 102.17(c)(8)(ii).

The auditors' review reveals a number of apparent joint fundraising violations regarding the receipt and reporting of joint fundraising proceeds. First, the Committee did not deposit all of the gross proceeds into the depository account. Instead, $28,343.50 of the $655.820.61 in proceeds was deposited directly

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into an account of the Committee, a fact acknowledged to the auditors by a representative of the Committee. Additionally, the auditors report that not all disbursements were made from the fundraising account. A Committee account paid $41,582.75 of the $669,059.86 in total disbursements. Therefore, the Committee did not utilize the depository account as required by 11 C.F.R. § 102.17(c)(3)(ii).

Second, although the committees held the fundraising event in August 1984, none of the joint fundraising activity was revealed until the Gramm Committee amended its reports in August, 1985. Thus, for more than one year no information regarding the Gramm Committee's joint fundraising activity appeared on the public record. As previously noted, these amendments understate gross proceeds and gross disbursements. These amendments include information that the Committee received net proceeds of $316,131.30 as a transfer-in. Prior to these amendments it appears the Committee had reported contributions comprising its share of net proceeds as if received directly by the Committee from contributors instead of as the result of a transfer-in. Therefore, the Committee failed to meet the requirements of 11 C.F.R. §§ 102.17(c)(8)(i)(A) and (B) and 102.17(c)(8)(ii).

3. Fundraising Notice

Additional problems are apparent from the joint fundraising notice used by the Committee. The Commission's Regulations provide detailed requirements for fundraising notices. See 11 C.F.R. § 102.17(c)(2)(i). Included within these provisions is the requirement that such notice include a statement informing

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contributors that contributions may be designated for a particular participant and that the stated allocation formula may be changed if a contribution would result in an excessive contribution to a participating entity. The Gramm Committee failed to include this required information on its fundraising notice. Therefore, the Committee failed to meet the requirements of 11 C.F.R. § 102.17(c)(2)(i).

J. SUMMARY OF VIOLATIONS

This Office recommends that, based on new information resulting from the audit, the Commission find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 2 U.S.C. § 441b(a). As previously noted, the Commission earlier determined that there was no reason to believe this provision had been violated based solely on a corporate contribution made in the name of another. The auditors have determined, however, that the Committee accepted prohibited corporate contributions. This Office also recommends that the Commission find reason to believe the Friends of Phil Gramm and John Baxter, as treasurer, violated 11 C.F.R. § 103.3(a) by failing to deposit contributions from political committees in a timely manner.

Moreover, this Office makes no new recommendations regarding the Commission's previous determinations of violations of 2 U.S.C. §§ 441a(f), 434(b)(8), 434(b)(5)(A) and 434(b)(3)(A) and

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11 C.F.R. § 102.17 but will conciliate on the basis of the new facts presented herein.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: THE COMMISSION

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN JM

DATE: MARCH 8, 1988

SUBJECT: STATEMENT OF REASONS FOR MUR 1837

Attached is a copy of the signed Statement of Reasons in MUR 1837 received in the Commission Secretary Office Monday, March 7, 1988 at 5:20 P.M.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1837
Friends of Phil Gramm	)	
and John Baxter, as treasurer	)	

STATEMENT OF REASONS

I. On October 27, 1987, the Federal Election Commission determined to take no action with respect to the General Counsel's recommendation to find reason to believe the Friends of Phil Gramm and John Baxter as treasurer ("respondents") violated 2 U.S.C. § 441a(a)(1)(C). Our determination was based on the fact that the Gramm Committee's overpayment of joint fundraising expenses for a state committee is not viewed as a contribution under the Federal Election Campaign Act.

II. On December 8, 1987, the Commission determined to take no action with respect to the General Counsel's recommendations to find reason to believe the First City National Bank of Bryan, Texas and the respondents violated 2 U.S.C. § 441b(a) regarding 27 overdrafts paid on the Committee's primary account.

The Act prohibits any national bank from making a contribution in connection with a federal election. 2 U.S.C. § 441b(a). The Commission's regulations, however, provide that an overdraft paid on a campaign's account will not be considered a contribution by the bank if it is made on an account which is subject to automatic overdraft protection, the overdraft is subject to a definite interest rate which is usual and customary, and there is a definite repayment schedule. 11 C.F.R. § 100.7(b)(11).

Our determination to take no further action was based on the fact that the account was overdrawn for only eight days in an amount of $39,800.34 and that the Committee was assessed a $12.50 per

check service charge for 18 of the 27 overdrafts. Further, if the net balance of the primary account was combined with the respondent's general account, the total account balance was overdrawn for only one day in the amount of $11,136.94. Consistent with the handling of similar matters and in the proper ordering of our priorities and resources, see Heckler v. Chaney, 470 U.S. 821 (1985), the Commission concluded that no further action was necessary.

Signing for Parts I and II:

Thomas J. Josefiak
Chairman

Joan D. Aikens
Commissioner

Lee Ann Elliott
Commissioner

John Warren McGarry
Commissioner

Signing for Part II only:

Scott E. Thomas
Commissioner

Danny Lee McDonald
Vice Chairman

March 4, 1988

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

88 MAY 19 AM 9:20

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WASHINGTON, D. C. 20005

202 789-8600

JAMES F. SCHOENER
202 789-8644

May 18, 1988

Marie P. Reilly
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 1837 Friends of Phil Gramm, et al

Dear Ms. Reilly:

Enclosed are the original and nine copies of the Response to Factual and Legal Analysis of your office in the above entitled MUR. I am also delivering additional documentation on 29 contributors for which your auditors found previously inadequately attributed. I believe, these items have been discussed by Mr. Keith Davis of our accountants office with your auditor Mr. Favin.

I hope the response which we have furnished and a review of the entire file will convince you of the fairness and logic of our response and that we may close this long standing file with an appropriate conciliation agreement.

Very truly yours,

James F. Schoener

James F. Schoener

cc: Hon. Phil Gramm
Stan Huckaby, C.P.A.
Charles Black
John Baxter

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BEFORE THE FEDERAL ELECTION COMMISSIONS

Response to the General Counsels
Factual & Legal Analysis
MUR 1837

Submitted by: James F. Schoener, Counsel to
the Friends of Phil Gramm and
John Baxter, as treasurer.

This response is made to the General Counsel's report in MUR 1837 which was originated by complaint of Ms. Donna Mobley of Austin, Texas.

The complaint, in essence, objected to contributions toward retirement of a primary election "debt" when the Federal Election reports did not disclose debts owed by the Friends of Phil Gramm, the principal campaign committee of Phil Gramm in his 1984 race for United States Senator from Texas.

Immediately upon the receipt of the complaint, Senator Gramm and the treasurer, John Baxter, began a review of the contributions and expenditures reported by the committee. When the extent of the task was recognized, a nationally-recognized certified public accountant was retained to review and examine every contribution and expenditure and the documentation and reporting of these records to the Federal Election Commission. These accountants conducted a review of 80,000 contributions and over 500,000 documents over a period of seven months with as many as 14 people working on the Committee records. Cost to the Committee exceeded $300,000 to perform these services. Pursuant to this review the Committee checked 2550 possible corporate checks at the Texas State Corporation office and found 230 were,

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in fact, existing corporations. Refunds of approximately $10,000 were then made out of total contributions of approximately $10,000,000 (approximately 1/100th of 1%) as a result of this examination. Proper documentation of other apparent excessive contributions was exhibited to the FEC auditors for all but approximately 24 contributors out of a total of 80,000 contributions. Those final contributions will be refunded as a part of the conciliation agreement.

The primary debt was established by amended returns, the correction of other records proceeded as rapidly as possible. Recreation of records was especially difficult since the campaign was concluded and most of the campaign personnel were no longer employed by the committee. Refunds of improper contributions, or reattribution or reallocation of contributions was accomplished as the documentation was ascertained. It is believed that some of the original records were inadvertently discarded by voluntary or part time committee assistants. The previous Federal Election Commission reports which were all filed by the assistant treasurer, relying on data accumulated and processed by third party outside accounting firms, (Clesa Accounting and Campac Campaign Accounting) were amended by John Baxter as treasurer as the work progressed.

Prior to the action by John Baxter as treasurer the campaign had hired an outside accounting firm to do their campaign records. This firm held itself out as a competent, computerized

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system that could account and report federal campaigns in accordance with the law. After several months early in the campaign it became apparent that this system was inadequate to perform the task involved. For instance, the records were badly confused when the computer program failed to keep accurate cumulative records of contributions - an important part of F.E.C. accounting.

At that time the assistant treasurer sought out another accounting group to straighten out the prior problems and to carry on thereafter. This vendor had a prior record of proper Senatorial F.E.C. accounting, but due to the initial erroneous reporting and due to the huge volume of contributions and expenditures, the second vendor also was unable to perform properly.

Therefore in July of the election year (after the primary was over), the campaign purchased its own computer, developed the [necessary] programming to accommodate the campaign's position and began to furnish the reporting "in-house." It was recognized at that time that the reports would have to be amended as the revised accounting progressed. Accordingly, the treasurer readily acknowledged the problems when the complaint was filed and immediately advised the commission of the Committee's intent to prepare and file complete and thorough amendments to its reports.

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This campaign, which raised and spent as much money as many presidential primary campaigns is not significantly different in violation than most of those comparable campaigns as disclosed in their audits. It is submitted that in such perspective, as well as several comparable Senate campaigns, the civil penalty suggested by the general counsel is excessive. For comparable campaigns with similar errors, see MUR 2154, MUR 1354, MUR 2194, MUR 2206, MUR 2093, MUR 1768.

As the Commission has recognized in past MURs, where a committee has attempted to correct its own errors as soon as they are discovered, the Commission makes allowances for such Committees' efforts. Indeed, as shown on page 8 of the Factual and Legal Analysis:

> "The auditors, on a sample basis, have reviewed the Committee's original reports in relation to contribution records and determined that the committee failed to include all required information, but that amended reports materially corrected these deficiencies."

It is submitted that the committee filed these amended reports July 26, 1985. The Commission commenced its audit seven months later in February 1986. Longer delays in filing reallocations and reattribution in MUR 2093 (Simon for Senate) occasioned a civil penalty considerably smaller than suggested by the general counsel in this matter. We submit that after the primary debt was properly and accurately established, the Committee thereafter

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filed its additional amendments, corrections and refunds on a voluntary basis.

The Committee suggests that the civil penalty as involved against the 1984 Cranston Committee (MUR 1710) of $1,500 where over $1,150,000 of debt was not reported would seem to establish a range for the civil penalty to be imposed for failure to disclose the debt. There are other similarities between the Gramm and Cranston committees since each committee had bad results from Computer assisted reporting firms, but, in contrast, the Cranston Committee was also operating with federally - matched funding so it had an even greater obligation to report accurately. It is additionally submitted that the Cranston Committee further aggravated the problem in that over 736 checks were "bounced" and state and federal taxes withheld from employees were not paid as required. No violations of that sort were involved with the Gramm Committee.

As the Committee informed the Commission when the complaint of Ms. Mobley was first filed (in 1984), it admitted that it failed to disclose so-called "debts" as defined under the Federal Election Campaign Act. (See letter dated November 9, 1984, attached). Originally, the treasurer and assistant treasurer who had filed the reports subject to the Mobley complaint, were under the impression that "debts" were loans or trade accounts that were not being paid in accordance with their terms. In the Gramm Committee no loans were involved, and creditors were timely paid.

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The treasurer and assistant treasurer also failed to understand that if services or materials had not as yet been billed or the amounts due agreed upon, that under the FECA definition they still could qualify for reporting as "debts." After the complaint was filed and the treasurer was informed of the requirements, he revised and amended the reports as ascertained by the accountants.

The candidate was an incumbent member of Congress at the time he declared for the United States Senate. Accordingly he was legally allowed to transfer funds from this House campaign committee to his Senate committee. This transfer did occur. Careful allocation of contributions received after the House election and listing of the contributors who accounted for such transfers was made and documentation of those contributions was made to satisfy the Reports Analysis Division of the Federal Election Commission. Nonetheless, the General Counsel on page 12 of his Report, arrives at other conclusions indicating failure to document 2.58% of the transfers. Although the Committee requested information on this alleged failure, because the general counsel recommended no further action, the Committee believes that Section F of the Analysis should be omitted.

The matters brought up by the auditor concerning the joint fundraiser in which this committee inadvertantly overpaid its share of expenses have been examined by the Friends of Phil Gramm. Inquiry by the treasurer has disclosed the two

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participating committees in Texas are no longer in existence and no assets were left from those committees. It is therefore apparent that this part of the reimbursement will be unavailable. The other participant, the National Republican Senatorial Committee has been asked to pay the Friends of Phil Gramm the amounts shown by the F.E.C. audit. The Committee will advise the F.E.C. when this is accomplished.

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Best Efforts

It is submitted that John Baxter, in his capacity as treasurer met the statutory requirement of "best efforts." 1/ As the record will show, initial efforts were to use an outside computerized accounting firm. When its capacity was disclosed to be inadequate, a shift to a more experienced accounting firm was undertaken. When that firm also was unable to perform, the treasurer (a volunteer) took over and carried forward with the duties. When time allowed and the personnel were available, the treasurer (and the candidate) brought in the best certified accountants that could be obtained to review, correct, and amend all of the reports and records of the campaign. These efforts meet the Congressional intent as expressed by Senator Packwood

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1/ Section 432 (i) of the F.E.C.A. provides, "when the treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit the information required by this Act, any report or any records of such committee shall be considered in compliance..."

when he introduced the "best efforts" provision on the floor of the Senate. He said, "This is the anti-nit-picking amendment...everybody I have run across in this election year, I have advised not to be a political treasurer..." Cong. Record, Senate March 24, 1976, p. S4182, Legislative History, Federal Election Campaign Act Amendments, 1976. p. 522.

The record is devoid of any indication of "willful and knowing" violation of the Act and the proposed civil penalty seems excessive in that light. The treasurer and the candidate have at all times attempted good faith compliance with the Act, readily admitted the problems that occurred, and also admitted a misunderstanding of the term "debt" as applied to federal election records. As rapidly as could be accomplished in response to the complaint, the "debts" were disclosed and amendments filed. On a voluntary basis, all other records were examined and corrected.

Finally it is submitted that Friends of Phil Gramm, John Baxter its treasurer, and the candidate Senator Phil Gramm entered into the response in the spirit of the Act which enjoins the Commission to "make every effort to correct...violations by informal methods...conference, conciliation, or persuasion..." Conference Report Federal Election Campaign Act Amendments 1976, 94-1057 page 47. For the Commission to now assert a civil penalty as suggested by the general counsel would be to penalize

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good faith efforts by the respondents to correct apparent violations.

The Friends of Phil Gramm Committee under the direction of its treasurer, John Baxter, promptly corrected the failure to disclose the primary debt of the committee and voluntarily caused a complete and thorough review of its entire history to be performed, and amended, documented, corrected its reports, and refunded improper contributions. It is submitted that a civil penalty of Ten Thousand Dollars is the largest that should be assessed in this MUR.

Respectfully submitted

James F. Schoener

James F. Schoener
Attorney for Respondents
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May 18, 1988

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SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1868-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN
WASHINGTON, D.C.

JAMES F. SCHOENER
(202) 789-8643

November 9, 1984

HAND DELIVERED

Patty Reilly, Esquire
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Dear Ms. Reilly:

As counsel for the respondents Phil Gramm, Friends of Phil Gramm, Ruth Cymber and John Baxter, as the assistant treasurer and treasurer of the Friends of Phil Gramm, I have reviewed the Complaint filed October 30, 1984 and find that the volume of detail required to properly respond to this Complaint is such that we are unable to furnish such detail within the time set by the law and regulations.

We do, however, have sufficient information to indicate the following:

1. There was, in fact, an indebtedness left from the primary campaign in 1984 in excess of $200,000.

2. The exact amount of the indebtedness was not available at either of the reporting periods before the general election for a variety of reasons among which are:

   a. Bills were in several different campaign offices and had not yet been forwarded to the Washington, D.C. office;

   b. Several vendors had not sent bills although requested to do so several times. Subsequent requests similar to the attached letter have been sent to all vendors who have neglected to bill us;

   c. Several large bills were questioned and required further explanation, and consequently the committee did not know the amount owed.

3. The unanticipated volume of contributions required our installing a computerized reporting system in the middle of the campaign, which further complicated our reporting process.

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As is usual in large campaigns such as ours, we are further hampered because our staff has been reduced after Tuesday's election and many are on well deserved vacations. Any reason to expedite this matter is obviated by the election, and full disclosure of the Complaint was highly publicized prior to the election by the Complainant and Congressman Gramm's opponent. The need for an expedited response no longer exists.

We have retained the services of Mr. Stan Huckaby of Austin, Texas, a certified public accountant with considerable experience in Federal Election Commission matters, to obtain the exact figure that will indicate the debt as of each reporting date. This, of course, requires confirmation from a large number of creditors spread over a number of different cities in Texas and other parts of the country. When those exact figures can be obtained, we will file a response supported by relevant detail that will reply to the basic thrust of the Complaint, viz, the primary debt.

We have been contacted by a number of contributors to the Friends of Phil Gramm who have received copies of the Complaint and they have apparently been added as respondents, although not so named in the Complaint. I find this process surprising under the usual and normal practice of the Commission. Since the contributors would not be in violation when the primary debt is established, it appears to be a strange practice to have sent this voluminous Complaint to these many citizens who are not familiar with nor regularly involved with the type of the problem at issue. Nor could they respond to the allegations in any material manner.

For the reasons set forth above, the respondents we represent respectfully request an additional 30 days to file a certified report of the corrected outstanding indebtednesses at the two reporting periods involved. We will file specific answers to all of the other allegations. We further ask that the added contributor-respondents be allowed to avoid responding until the threshold question of the primary debt is determined.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener

JFS/cb

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PHIL
GRAMM
U.S. SENATE TEXAS

October 31, 1984

TO: All Vendors
FROM: Richard H. McBride - Campaign Manager
SUBJECT: Outstanding Bills

In order to assure that all bills are paid and to assure that we don't incur unexpected debts after the campaign, please send in all outstanding invoices as soon as possible. All bills received by November 10th will be paid on November 12th. All others will be paid by the first of next year.

If you have any questions, please call me at 512/458-2241.

Paid for by Friends of Phil Gramm

8 2 0 4 0 7 4 4 2 5 5

FRIENDS OF PHIL GRAMM
A NON PROFIT WASHINGTON DC CORP.
2355 STEMMONS, SUITE ~~509~~ /203
DALLAS, TEXAS 75207

Bright Banc
Savings Association
Banking Convenience Statewide
Dallas • Ft. Worth • Houston • Austin • San Antonio
Headquarters • Dallas, TX 75207

6415

32-7130/3110

March 24 19 89

PAY REGISTERED D-23534 30000 dol's 00 cts DOLLARS $ 30000.00

Treasurer of the United States

⑆311071304⑆ 800 002439 4⑈ 6415

DELUXE CHECK PRINTERS

06 C 2290

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER

FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 6415 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 1837 (Reilly) AND NAME Friends of Phil Gram

WAS RECIEVED ON 3/27/89. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ✓ / BUDGET CLEARING ACCOUNT { 95F3875.16 }

/ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }

/ / OTHER

SIGNATURE Debra A. Trimiew DATE 3/27/89

RECEIVED
FEDERAL ELECTION COMMISSION
89 APR -6 AM 3:16

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1837
The Friends of Phil Gramm and Donald White, as treasurer	)	

SENSITIVE

GENERAL COUNSEL'S REPORT

Attached for Commission approval is a conciliation agreement signed by counsel of the Friends of Phil Gramm and Donald White, as treasurer. This agreement does not contain any changes from the agreement approved by the Commission at its January 10, 1989 meeting.[1] A civil penalty check accompanied this agreement. Included with the attached proposed letters is a sample letter to be sent to the 171 persons who were also named in the complaint, but who are no longer respondents in this matter. The Office of the General Counsel recommends that the Commission accept this agreement.

Respondents have also provided materials to be placed on the public record, including a Response to the General Counsel's Factual and Legal Analysis, dated May 18, 1988. Because respondents initially submitted this document in the context of preprobable cause conciliation, this Office construes its resubmission as a request for a waiver of 2 U.S.C. § 437g(a)(4)(B)(i) as to this document. Counsel has orally confirmed his intention that the document in its entirety be placed on the public record, including a reference (Attachment 5,

1. At the request of this Office, respondents' counsel agreed to reinsert the word "excessive" at page 2, subparagraph 5. This word was inadvertently dropped from the agreement.

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page 9) to a proposed civil penalty amount. This Office has no objection to the public disclosure of this document.

RECOMMENDATIONS

1. Accept the attached conciliation agreement submitted on behalf of the Friends of Phil Gramm and Donald White, as treasurer.

2. Consent to the public disclosure of the document dated May 18, 1988 at Attachment 5.

3. Approve the attached letters.

4. Close the file in this matter.

Date 7/6/89

Lawrence M. Noble
General Counsel

Attachments
1. Conciliation Agreement
2. Check
3. Proposed letters (2)
4. Sample letter
5. Respondents' statement for the public record

Staff Person: Patty Reilly

8204074425 8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Friends of Phil Gramm and Donald White, as treasurer	)	MUR 1837
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 11, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 1837:

1. Accept the conciliation agreement submitted on behalf of the Friends of Phil Gramm and Donald White, as treasurer, as recommended in the General Counsel's report signed April 6, 1989.

2. Consent to the public disclosure of the document dated May 18, 1988 at Attachment 5, as recommended in the General Counsel's report signed April 6, 1989.

3. Approve the letters, as recommended in the General Counsel's report signed April 6, 1989.

(Continued)

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4. Close the file in this matter.

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

Attest:

4-11-89
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Thurs., 4-6-89, 3:1[illegible]
Circulated on 48 hour tally basis: Fri., 4-7-89, 12:0[illegible]
Deadline for vote: Tues., 4-11-89, 4:0[illegible]

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donna Mobley
1404 East 37th
Austin, Texas 78722

Re: MUR 1837

Dear Ms. Mobley:

This is in reference to the complaint you filed with the Federal Election Commission on October 30, 1984, concerning the Friends of Phil Gramm ("The Committee") and approximately 171 other persons.

On March 5, 1985, the Commission found reason to believe the Committee and its treasurer violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), 434(b)(3)(A), as well as 11 C.F.R. § 102.17. Also on that date, the Commission determined to refer the Committee to the Commission's Audit Division for a section 437g(a) audit.

Additionally, on March 5, 1985, the Commission found no reason to believe 32 respondents violated 2 U.S.C. §§ 441a(a)(1)(A) or 441a(a)(1)(C) and took no further action with respect to all other respondents except one, M.N. Bostick. The Commission found reason to believe M.N. Bostick violated 2 U.S.C. § 441f, and found reason to believe KWTX Corporation violated 2 U.S.C. §§ 441b and 441f. Conciliation agreements signed prior to a finding of probable cause to believe were reached with these latter two respondents and are attached for your information.

On October 27, 1987 and December 8, 1987, following the audit, the Commission determined there was reason to believe the Committee and its treasurer violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 103.3. Enclosed please find a Statement of Reasons signed by the Commission explaining its decisions to take no action regarding the General Counsel's recommendation to find reason to believe the Committee and its treasurer violated 2 U.S.C. §§ 441a(a)(1)(C) and 441b(a) regarding overdrafts paid on the Committee's account. This document will be placed on the public record as part of the file in MUR 1837.

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On April 11, 1989, a conciliation agreement signed by the respondents was accepted by the Commission. Accordingly, the Commission closed the file in this matter on April 11, 1989. A copy of this agreement is enclosed for your information.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosures
Conciliation Agreements (3)
Statement of Reasons

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. M.N. Bostick
P.O. Box 7528
Waco, TX 76710

RE: MUR 1837

Dear Mr. Bostick:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

James F. Schoener, Esquire
Legal Services Corporation
400 Virginia Avenue, S.W.
Washington, D.C. 20024-2751

RE: MUR 1837
Friends of Phil Gramm and
Donald White, as treasurer

Dear Mr. Schoener:

On April 11, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), 434(b)(3)(A), and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended, as well as 11 C.F.R. §§ 102.17 and 103.3, provisions of the Commission's Regulations. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days.

The Commission acknowledges receipt of materials you have submitted for inclusion in the public record of this case. The Commission has consented to public disclosure of the document dated May 18, 1988 which was a part of this submission. See 2 U.S.C. § 437g(a)(4)(B)(i). Please be advised that additional information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. Id. The enclosed conciliation agreement, however, will become a part of the public record. If you wish to submit any additional factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Patty Reilly, the attorney assigned

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to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1837
Friends of Phil Gramm and)
Donald White, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Donna Mobley. The Commission found reason to believe that the Friends of Phil Gramm and its treasurer, ("Respondents") violated 2 U.S.C. §§ 434(b)(8), 434(b)(5)(A), 441a(f), 434(b)(3)(A), 441b(a), and 11 C.F.R. §§ 103.3 and 102.17.

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of 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. Following the filing of the complaint in this matter, respondents completely audited all of its records and on July 26, 1985, voluntarily filed comprehensive amendments for all committee activity from July 1983 through December 1984.

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

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

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1. Respondent, the Friends of Phil Gramm, is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Donald White, is the treasurer of the Friends of Phil Gramm. At the time of the violations in question, John Baxter was the treasurer of the Friends of Phil Gramm.

3. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate or his authorized committee with respect to any election for federal office which, in the aggregate, exceed $1,000.

4. Pursuant to 2 U.S.C. § 441a(f), political committees are prohibited from knowingly accepting contributions exceeding the Act's contribution limitations.

5. Respondents initially accepted excessive contributions totalling $690,999.05 from 874 persons.

6. Respondents submit that most of these excessive contributions were refunded, redesignated, or reallocated, but this was not accomplished in a timely manner.

7. Pursuant to 2 U.S.C. § 434(b)(8), political committees are required to report the amount and nature of outstanding debts and obligations owed by such committees.

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8. The initial reports filed by Respondents for its first six reports filed in the 1984 election cycle did not disclose any outstanding debts.

9. Respondents filed amended reports in December, 1984, and in July 1985 amending all of its questioned reports as follows:

FEC Report Date	Original Debt Reported	Amended Debt Reported on August * Amendments
1. 7/1/83-12/31/83	$ 0	$203,212
2. 1/1/84-3/31/84	$ 0	$ 88,926
3. 4/1/84-4/15/84	$ 0	$ 39,902
4. 4/16/84-6/30/84	$ 0	$389,452
5. 7/1/84-9/30/84	$ 0	$126,876
6. 10/1/84-10/17/84	$ 0	$333,824
7. 10/18/84-11/26/84	$152,937	$145,373
8. 11/27/84-12/31/84	$102,191	$ 98,677

10. Respondents submit that some of these debts were disputed and that others were not yet payable under the terms of the contracts involving such debts. (In five of the above reports amounts varying from six thousand dollars to eighty-one thousand dollars are the same debt reported in different time periods. These debts often represented accounts that were not yet due and payable under the terms of the agreement. Other items shown as "debts" were trade accounts all of which were paid in the ordinary course of business.)

11. Pursuant to 2 U.S.C. § 438(b), however, respondents were required to continuously report all such outstanding debts.

* Rounded to the nearest dollar

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12. Pursuant to 2 U.S.C. § 441b(a), corporations are prohibited from making a contribution in connection with any election.

13. Political committees are prohibited from knowingly accepting corporate contributions. 2 U.S.C. § 441b(a).

14. Respondents accepted 127 contributions totalling $9,708 in corporate funds. All of such contributions were refunded in connection with the audits, but this was not accomplished in a timely manner.

15. Pursuant to 2 U.S.C. § 434(b)(3)(A), political committees are required to report the identification of each person who makes a contribution aggregating in excess of $200, along with the date and amount of such contribution.

16. Respondents' original reports filed with the Commission did not materially disclose all required information regarding the identification of contributors.

17. Respondents submit that such non-disclosure resulted from problems with computer firms retained by the committee to provide such disclosure.

18. Pursuant to 2 U.S.C. § 434(b)(5)(A), a political committee shall report the name and address of each person to whom an expenditure in an aggregate

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amount greater or value in excess of $200 within the calendar year is made, along with the date, amount, and purpose of such expenditure.

19. Respondents' original reports filed with the Commission materially did not disclose all expenditures requiring individual itemization.

20. Respondents submit that such lack of itemization resulted from the previously-noted problems with computer firms.

21. Pursuant to 11 C.F.R. § 103.3(a), the treasurer of a political committee is required to deposit all contributions into the committee's depository account within 10 days of the treasurer's receipt of such contributions.

22. Respondents did not deposit a significant number of contributions into its depository account within 10 days of the treasurer's receipt.

23. Respondents submit such delays resulted from its receipt of pre-dated checks and mail delays to and from Texas.

24. Respondents participated in a joint fundraising event with Texas Victory '84 Fund, Republican Host Committee, and the National Republican Senatorial Committee.

    a. The Commission's Regulations require that, where participants in a joint fundraising

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event are not affiliated political committees, the joint fundraising representative must first allocate gross proceeds to the participants and then calculate each participant's share of expenses based on the percentage of total receipts each participant has been allocated. 11 C.F.R. § 102.17(c)(7)(i)(A).

b. The Commission's Regulations further require that net proceeds are reached by the fundraising representative's subtraction of each participant's share of expenses from the amount that participant has been allocated from gross proceeds. 11 C.F.R. § 102.17(7)(c)(i)(A).

c. Respondents calculated gross proceeds as $613,997.11 instead of $645,320.61, thus affecting the amount of operating expenditures allocated to the participating committees. This, in turn, resulted in Respondents paying a greater share of fundraising expenditures. Thus, Respondents paid $2,899.07 in expenses for the Texas Victory '84 Fund, $5,270.88 in expenses for the Republican Host Committee and $506.22 in expenses for the National Republican Senatorial Committee.

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d. Pursuant to 11 C.F.R. § 102.17(c)(8)(i)(A), the fundraising representative shall report all funds received in the reporting period in which they are received, and shall indicate on Schedule A that such funds are joint fundraising proceeds.

e. Pursuant to 11 C.F.R. § 102.17(c)(8)(i)(B), following distribution of net proceeds, each participating political committee shall report its share of net proceeds received as a transfer-in from the fundraising representative. Additionally, each participating committee shall file a memo entry itemizing its share of gross receipts as contributions from the original contributors, if such contributions exceed $200 per contributor.

f. Pursuant to 11 C.F.R. § 102.17(c)(8)(ii), the fundraising representative shall report all disbursements in the reporting period in which such disbursements are made.

g. Fundraising entities must establish a separate depository account and joint fundraising proceeds must be deposited into this account within 10 days of receipt. 11 C.F.R. § 102.17(c)(3)(ii).

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h. Respondents did not deposit all joint fundraising proceeds into the separate joint fundraising account (depositing $28,343.50 into its general campaign acount), and did not make all disbursements from the separate joint fundraising account, (disbursing $41,582.75 from the Committee's general campaign account).

i. Respondents did not report any joint fundraising activity for an event occurring in August, 1984, on their reports for that period until amendments were filed one year later in August, 1985.

j. Respondents erroneously computed the gross proceeds and gross disbursements on its amended reports, however, the additional gross proceeds and gross disbursements were reported in the amended reports of the Friends of Phil Gramm, although these were not identified as such joint fundraising proceeds.

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k. The Commission's Regulations require specific information on joint fundraising notices. The requirements include a statement informing contributors that contributions may be designated for particular participant and that the stated allocation formula may be changed if a contribution would result in an excessive contribution to a participating entity. See 11 C.F.R. § 102.17(c)(2)(i).

l. The respondents' joint fundraising notices did not include such statements to contributors regarding designation and reallocation of excessive contributions.

VI. Respondents do admit that the violations as alleged in paragraph V above did, in fact, occur, but respondents contend said violations were not knowing and willful.

VII. 1. Respondents have agreed to pay a civil the amount of Thirty Thousand Dollars ($30,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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2. Respondents have made refunds to all known contributors who were identified as excessive, and refunds to the remaining 16 excessive contributors that cannot be located will be distributed as permitted by law.

3. Respondents will seek reimbursement of operating expenditures it paid on behalf of the other participants in its joint fundraising activity.

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 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.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

Date 4/14/89

FOR THE RESPONDENTS:

James F. Schoener, Counsel to
Friends of Phil Gramm

Date 24 March 1989

2904027 44276

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ANNEX A TO THE PUBLIC RECORD FILE IN MUR 1837

(SEE NOTE AT FIRST PAGE OF THE MICROFILM FILE)

A

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Ms. G. Kimberly Klein
620 S. Taylor
Amarillo, TX

RE: MUR 1837

Dear Ms. Klein:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Ms. G. Kimberly Klein
620 S. Taylor
Amarillo, TX

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943168

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-13-84

6. ADDRESSEE'S ADDRESS (Only if requested)

AMARILLO TX POSTMARK NOV 13 1984

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/14/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Louis W. Kreditor
1365 Regal Row
Dallas, TX 75247

RE: MUR 1837

Dear Mr. Kreditor:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Kelly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Louis W. Kreditor
1365 Regal Row
Dallas, TX 75247

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943167

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

5. DATE OF DELIVERY 11/9/84

POSTMARK RECEIVED NOV 9 1984 P.M.

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Jessie V. Kniveton
1506 S. Ike
Monahans, TX 79756

RE: MUR 1837

Dear Ms. Kniveton:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074282

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8900744285

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Jessie V. Knireton
1506 S. Ike
Konahans, TX 79756

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943166

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-10-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
1506 Ike
Konahans TX 79756

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. James E. Kellum
2114 Sunnyvale
Grand Prairie, TX 34575

RE: MUR 1837

Dear Mr. Kellum:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074284

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Kelly

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. James E. Kellum
2114 Sunnyvale
Grand Prairie, TX 35475

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943165

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY 11/1/84

POSTMARK
GRAND PRAIRIE TX
NOV 19 1984
USPO

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 920 407 442

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. William David Lacy
3210 Wooded Aires
Waco, TX 76703

RE: MUR 1837

Dear Mr. Lacy:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Kelly

PS Form 3811, Dec. 1980

SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. William David Lacy
3210 Wooded Aires
Waco, Texas 76703

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943164

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Mrs Walter Lacy Jr

5. DATE OF DELIVERY
11-10-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
3210 WOODED ACRES
WACO, TX. 76703

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS
TWD

11/1/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 390 407 442 837

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Beth Logue
1300 One Energy Square
Dallas, TX 75206

RE: MUR 1837

Dear Ms. Logue:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074298

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
   - ☐ Show to whom and date delivered ..... ___¢
   - ☒ Show to whom, date, and address of delivery .. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
   (*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mrs. Beth Logue
1300 One Energy Square
Dallas, TX 75206

4. TYPE OF SERVICE: ☐ REGISTERED ☐ INSURED ☒ CERTIFIED ☐ COD ☐ EXPRESS MAIL

ARTICLE NUMBER 943134

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Elizabeth Merritt

5. DATE OF DELIVERY 11-9-84

POSTMARK DALLAS UNIVERSITY STA. NOV 9 1984 USPO

6. ADDRESSEE'S ADDRESS (*Only if requested*) OE Sa

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

8 9 0 4 0 7 4 4 2 8 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Willard H. Hammonds
P.O. Box 6769
Corpus Christi, TX 78411

RE: MUR 1837

Dear Mr. Hammonds:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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2004074290

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 7 4 4 2 9 1

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
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   - ☒ Show to whom, date, and address of delivery .. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
   (*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mr. Willard H. Hammonds
P.O. Box 6769
Corpus, Christi, Tx 78411

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943161

(Always obtain signature of addressee or agent)

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

David Zamara

5. DATE OF DELIVERY | POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE: | 7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Joel Daniel
P.O. Box 130
Llano, TX 78643

RE: MUR 1837

Dear Mr. Daniel:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

89040744293

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
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☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Joel Daniel
P.O. Box 130
Llano, TX. 78643

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943160

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
NOV 9 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. John W. Dixon
5065 Lakehill Court
Dallas, TX 75220

RE: MUR 1837

Dear Mr. Dixon:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074429 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Ms. Karen Edwards
P.O. Box 2431
Big Spring, TX 79720

RE: MUR 1837

Dear Ms. Edwards:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074429 3

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
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- ☒ Show to whom, date, and address of delivery .. —¢
- 2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Ms. Karen Edwards
P.O. Box 2431
Big Spring, TX 79720

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943158

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 13 1984

POSTMARK
NOV 13 1984 USPO

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Sally Emde
9507 Harwin Dr.
Houston, TX 77036

RE: MUR 1837

Dear Ms. Emde:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074297

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900407423

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $ —

3. ARTICLE ADDRESSED TO:
Mrs. Sally Emde
9507 Harwin Dr.
Houston, Tx. 77036

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943157

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-9-84

POSTMARK
HOUSTON, TX
NOV 9 1984
DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. William o. Emde
9507 Harwin Dr.
Houston, TX 77036

RE: MUR 1837

Dear Mr. Emde:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074429 9

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1897 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. William O. Emde
9507 Harwin Dr.
Houston, TX 77036

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
P 413 156

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-5-84

POSTMARK
DELIVERY NOV 1 1984 HOUSTON

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Albert Fay, Jr.
99 N. Post Oak Ln.
Houston, TX 77024

RE: MUR 1837

Dear Mr. Fay:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074301

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

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900407443022

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Albert Fay, Jr.
99 N. Post Oak Ln.
Houston, Tx. 77024

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943155

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:
7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Jerry W. Freeman
7524 Glen Albens
Dallas, TX 75225

RE: MUR 1837

Dear Mr. Freeman:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

3 9 0 4 0 7 4 4 3 0 3

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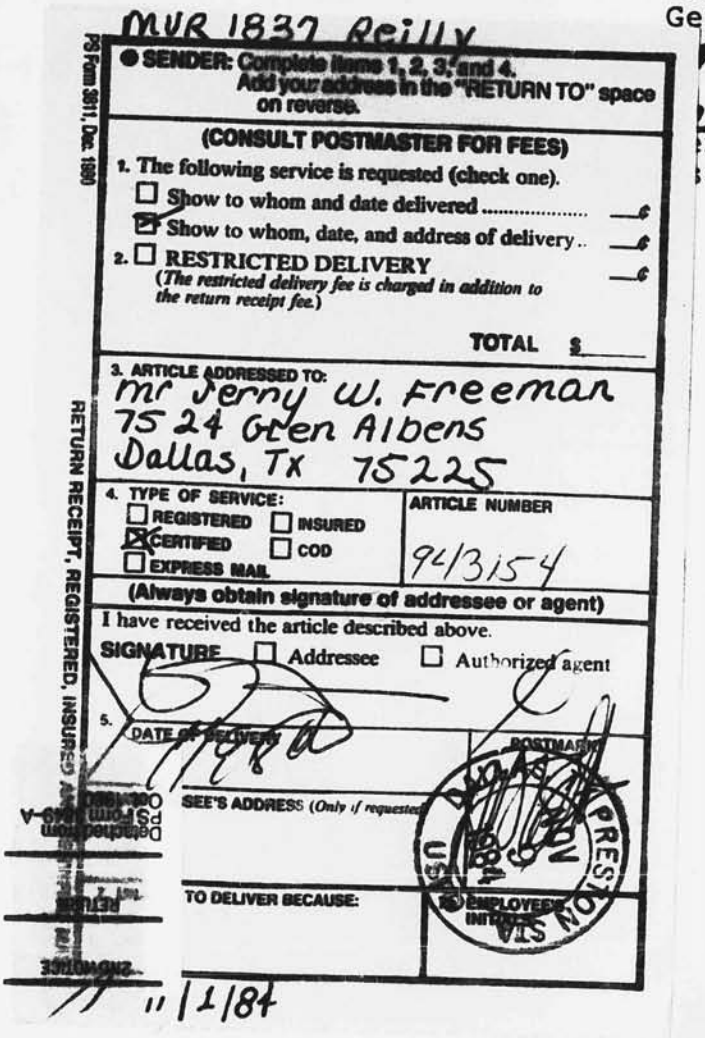
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



MUR 1837 Reilly

PS Form 3811, Dec. 1990

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☑ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr Jerry W. Freeman
7524 Glen Albens
Dallas, TX 75225

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
P 913 154

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11/1/84

POSTMARK

6. ADDRESS'S ADDRESS (Only if requested)

7. TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 913 044 304

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Margaret Folsom
16475 Dallas Parkway
Suite 800
Dallas, TX 75248

RE: MUR 1837

Dear Ms. Folsom:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8204074305

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Margaret Folsom
16475 Dallas Parkway
Suite 800
Dallas, Tx 75246

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
941353

(Always obtain signature of addressee or agent)

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

X [signature]

5. DATE OF DELIVERY
11-9-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 320 407 443

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Robert S. Folsom
16475 Dallas Parkway
Suite 800
Dallas, TX 75248

RE: MUR 1837

Dear Mr. Folsom:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

2204074307

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1897 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Robert S. Folsom
16475 Dallas Parkway
Suite 800
Dallas, TX. 75248

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943152

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-9-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. R.L. Foree, Sr.
3300 InterFirst One Building
Dallas, TX 75202

RE: MUR 1837

Dear Mr. Foree:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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9204074309

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. R. L. FOREE, Sr.
3300 Inter First One Building
Dallas, TX 75202

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943151

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 13 1984

POSTMARK
DALLAS TX FOREE STA
NOV 13 1984

6. ADDRESSEE'S ADDRESS (Only if requested and)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Wilton H. Fair
P.O. Box 689
Tyler, TX 75710

RE: MUR 1837

Dear Mr. Fair:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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2074311

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Wilton H. Fair
P.O. Box 689
Tyler, Tx 75710

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943150

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 9 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

TYLER, TX DOWNTOWN STA. POSTMARK NOV 9 1984 USPS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Thomas E. Hartin
5905 Club Oaks Drive
Dallas, TX 75248

RE: MUR 1837

Dear Mr. Hartin:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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9904074433

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

9290074431 4

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Thomas E. Martin
5905 Club Oaks Drive
Dallas, Tx. 75248

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943149

(Always obtain signature of addressee or agent)

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

X T Martin

5. DATE OF DELIVERY
11-8-84

POSTMARK
DALLAS TX 1984 8 AM

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. H. Wendell Hobbs
Route 1, Box 590
McAllen, TX 78504

RE: MUR 1837

Dear Mr. Hobbs:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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2004074315

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. H. Wendell Hobbs
Route 1, Box 590
McAllen, TX 78504

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943148

(Always obtain signature of addressee or agent)

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

5. Mr. H. W. Hobbs
DATE OF DELIVERY

McALLEN TX POSTMARK
NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested.

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

P 320 407 443 15

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. H. Wendell Hobbs
Route 1, Box 590
McAllen, TX 78504

RE: MUR 1837

Dear Mr. Hobbs:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

2004074317

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

3 2 0 4 0 7 4 4 3 1 8

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. H. Wendell Hobbs
Route 1, Box 590
McAllen, TX 78504

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943147

(Always obtain signature of addressee or agent)

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

5. H. W. Hobbs
DATE OF DELIVERY

McALLEN POSTMARK NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Edward Rea
5305 Mariners Drive
Plano, TX 75075

RE: MUR 1837

Dear Mr. Rea:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

2 2 0 4 0 7 4 4 3 1 9

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

enneth A. Gross
ssociate General Counsel

9200407443320

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Edward Rea
5305 Mariners Drive
Plano, TX 75075

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943168

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
NOV 14

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Dr. S.J. Rogers
P.O. Box 1310
Beaumont, TX 77006

RE: MUR 1837

Dear Dr. Rogers:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074432 1

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

enneth A. Gross
ssociate General Counsel

8 9 0 4 0 7 4 4 3 2 2

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ___¢
- ☒ Show to whom, date, and address of delivery .. ___¢

2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Dr. S.J. Rogers
P.O. BOX 1310
Beaumont, TX 77006

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943189

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11/9/84

POSTMARK
USPO BEAUMONT, TX NOV 9 1984

6. ADDRESSEE'S ADDRESS (*Only if requested*)
15th FIR 595 orleans

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. T.L. Roach, Jr.
P.O. Box 1871
Amarillo, TX 79105

RE: MUR 1837

Dear Mr. Roach:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074432 3

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 7 4 4 3 2 4

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
   - ☐ Show to whom and date delivered ..... ___¢
   - ☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
   (*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
MR. T. L. Roach, Jr.
P.O. Box 1871
Amarillo, Tx 79105

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943190

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

5. Marilyn Sayles
DATE OF DELIVERY

POSTMARK

AMARILLO, TX DOWNTOWN STA. NOV 13 1984 USPO

6. ADDRESSEE'S ADDRESS (*Only if requested*)
Box 1871

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Ms. Laurie Ramsey
3510 Cranbrook
Wichita Falls, TX 76308

RE: MUR 1837

Dear Ms. Ramsey:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074325

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

9904074443326

RNUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Ms. Laurie Ramsey
3510 Cranbrook
Wichita Falls, TX 76308

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943191

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1184

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. G.E. Roney
3316 Kent Lane
McAllen, TX 78501

RE: MUR 1837

Dear Mr. Roney:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074327

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074328

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. R.J. Schumacher
3402 Tx. American Bk. Bldg.
Ft. Worth TX 76102

RE: MUR 1837

Dear Mr. Schumacher:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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9904074329

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

nneth A. Gross
sociate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. R.J. Schumacher
3402 Tx. American Bk. Bldg
Ft. Worth, Tx. 76102

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943193

(Always obtain signature of addressee or agent)

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

5. Margaret Nettleton
DATE OF DELIVERY
13 NOV 1984

POSTMARK

6. ADDRESSEE'S ADDRESS (*Only if requested*)
3402 TEXAS AMERICAN BANK BLDG.

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

8 9 0 4 0 7 4 4 3 3 0

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Weldon H. Smith
7500 San Felipe Street
Suite 666
Houston, TX 77063

RE: MUR 1837

Dear Mr. Smith:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

9204074331

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

MUR 1897 Reilly

PS Form 3811, Dec. 1990

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Weldon H. Smith
7500 San Felipe St.
Suite 666
Houston, TX 77063

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
P 943 194

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-9-84

POSTMARK
HOUSTON TX BEECHNUT NOV 9 1984 STATION P.O.

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS

11/1/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 900 407 443

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Richard T. Sink
P.O. Bos BWH
Wichita Falls, TX 76307

RE: MUR 1837

Dear Mr. Sink:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8204074433 3

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900407443734

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Richard T. Sink
P. O. Box BWH
Wichita Falls, Tx. 76307

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943195

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 13 1984

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
624 Indiana
Wichita Falls, Tex. 76301

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Arthur Seeligson, III
1604 NBC Building
San Antonia, TX 78205

RE: MUR 1837

Dear Mr. Seeligson, III:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074335

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Arthur Seeligson
1604 NBC Building
San Antonio, TX 78205

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943196

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 9 1984

POSTMARK
NOV 10 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1837 Reilly 11/06/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. E. Trine Starnes
219 Heritage Oaks
Houston, TX 77024

RE: MUR 1837

Dear Mr. Starnes:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8204074433 7

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

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PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. E. Trine Starnes
219 Heritage Oaks
Houston TX 77024

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943197

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
Mrs E.T Starnes

5. DATE OF DELIVERY
POSTMARK
11-10-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:
7a. EMPLOYEE'S INITIALS
SJC

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Merle P. Stieler
P.O. Box 308
Comfort, TX 78013

RE: MUR 1837

Dear Ms. Stieler:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8204074339

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

9904074343340

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Merle P. Stieler
PO Box 308
Comfort, TX 78013

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943198

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-9-84

POSTMARK
COMFORT TX
NOV 9 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1887 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Pat Schiff
5307 Eask Mockingbird Lane
Dallas, TX 75206

RE: MUR 1837

Dear Ms. Schiff:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074434 1

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

P 890 407 442

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs Pat Schiff
5307 E. Mockingbird Lane
Dallas TX 75206

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943199

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
RECEIVED
NOV 5 1984
PM

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. S.S. Seltzer, Jr.
4025 Ocean Drive
P.O. Box 6382
Corpus Christi, TX 78411

RE: MUR 1837

Dear Mr. Seltzer:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074343

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 7 4 4 3 4 4

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. SS Seltzer Jr
4025 Ocean Drive
PO Box 6382
Corpus Christi TX 78411

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943200

(Always obtain signature of addressee or agent)

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

5. X S. S. Seltzer
DATE OF DELIVERY

POSTMARK
CORPUS CHRISTI, TX LAMAR PARK STA. 0150
NOV 16 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS
22

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Cathy Sowers
4811-32nd Street
Dickinson, TX 77539

RE: MUR 1837

Dear Ms. Sowers:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074345

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8 3 0 4 0 7 4 4 3 4 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. J.T. Shelton
3609 Pioneer Parkway
Arlington, TX 76013

RE: MUR 1837

Dear Mr. Shelton:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074347

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 7 4 4 3 4 8

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. J T Shelton
3609 Pioneer Parkway
Arlington TX 76013

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943202

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
ARLINGTON, TX
NOV 9 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

MUR 1837 Reelley 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Herbert Schiff
5307 East Mockingbird Lane
Dallas TX 75206

RE: MUR 1837

Dear Mr. Schiff:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8204074434349

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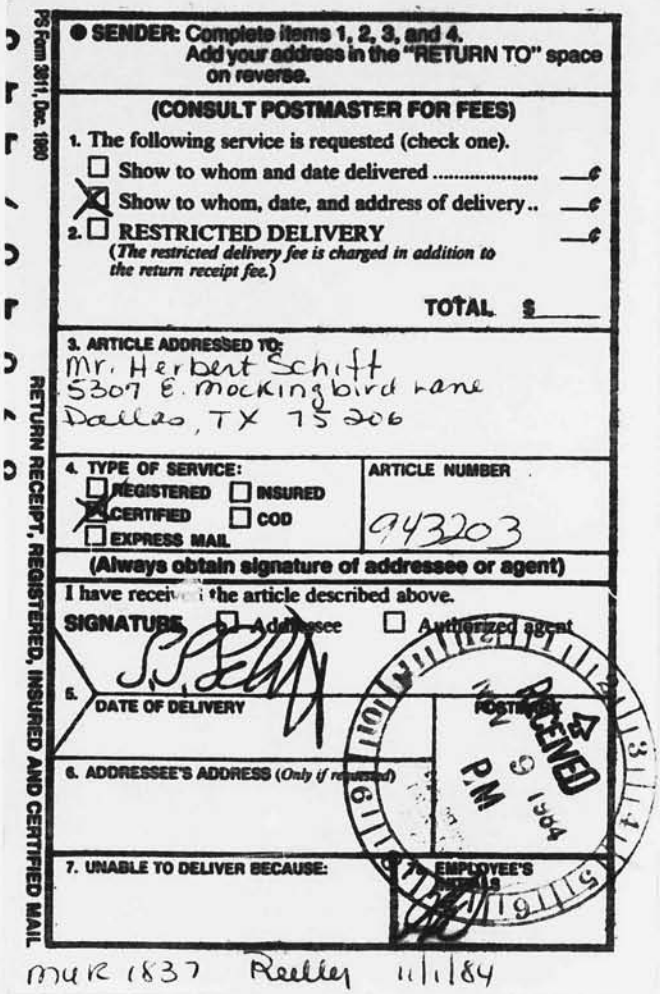
Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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(CONSULT POSTMASTER FOR FEES)

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(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Herbert Schiff
5307 E. Mockingbird Lane
Dallas, TX 75206

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943203

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK

RECEIVED NOV 6 1984 P.M.

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. John Sauer
P.O. Box 470063
Dallas, TX 75247

RE: MUR 1837

Dear Mr. Sauer:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8204074435 1

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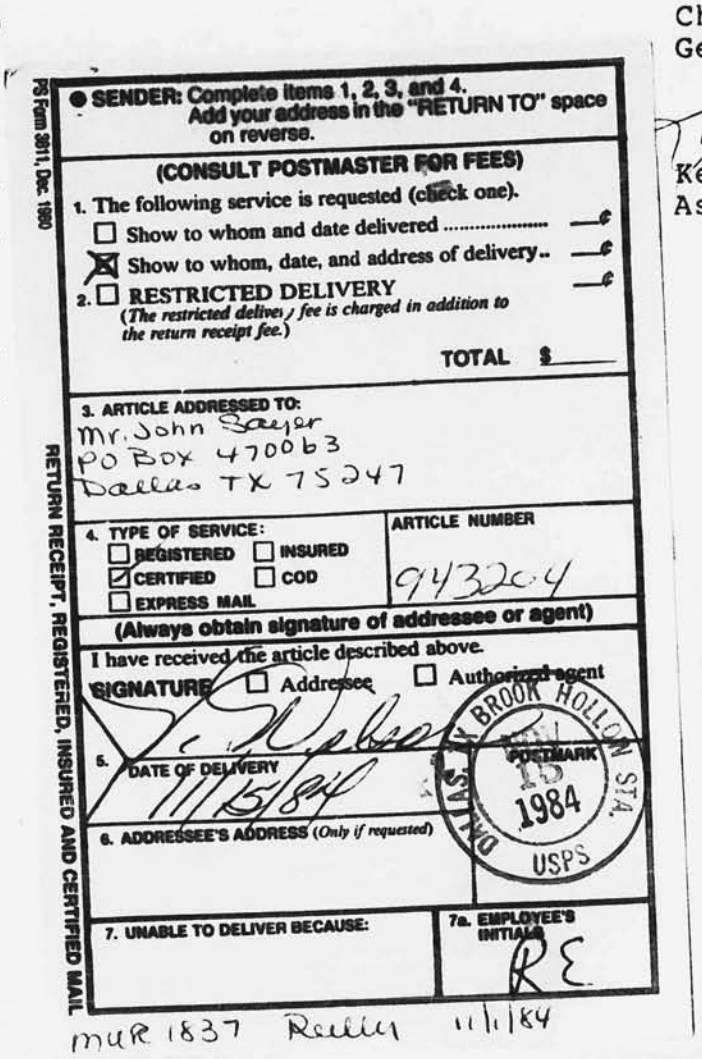
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

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(CONSULT POSTMASTER FOR FEES)

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☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. John Sayer
PO Box 470063
Dallas TX 75247

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943204

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY 11/5/84

POSTMARK
DALLAS TX BROOK HOLLOW STA.
NOV 5 1984
USPS

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS RE

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 920 074 352

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Marvin Selig
P.O. Box 911
Sequin, TX 78155

RE: MUR 1837

Dear Mr. Selig:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074435 3

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Marvin Selig
PO Box 911
Sequin TX 78155

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943205

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-12-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
Box 911

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Wayne Thomas
P.O. Box 1917
Bereford, TX 79045

RE: MUR 1837

Dear Mr. Thomas:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074435 5

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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(CONSULT POSTMASTER FOR FEES)

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2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $—

3. ARTICLE ADDRESSED TO:
Mr. Wayne Thomas
PO Box 1917
Bereford TX 79045

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943206

(Always obtain signature of addressee or agent)

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

Susan Sand

5. DATE OF DELIVERY 11-13-84

POSTMARK
NOV 13 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11.1.84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. David Tacke
5410 Royal Crest
Dallas, TX 75229

RE: MUR 1837

Dear Ms. Tacke:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074437

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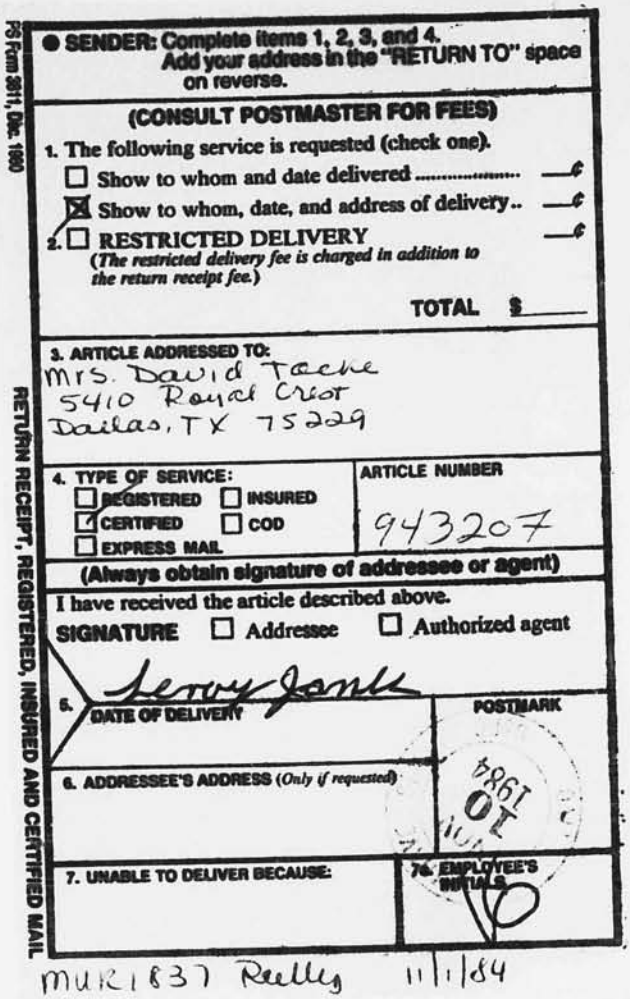
Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



8 9 0 4 0 7 4 4 3 5 8

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery.. —¢
- 2. ☐ RESTRICTED DELIVERY —¢
  (*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. David Tache
5410 Royal Crest
Dallas, TX 75229

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943207

(Always obtain signature of addressee or agent)

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

5. Leroy Jank
DATE OF DELIVERY

POSTMARK
10 1984

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Robert L. Triable
P.O. Box 8020089
Dallas, TX 75380

RE: MUR 1837

Dear Mr. Triable:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074359

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 2 0 4 0 7 4 4 3 6 0

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Robert L. Triable
PO Box 802087
Dallas TX 75380

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943208

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. David R. Tacke
5410 Royal Crest
Dallas, TX 75229

RE: MUR 1837

Dear Mr. Tacke:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074361

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. David Taeke
5410 Royal Crest
Dalla TX 75229

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943209

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Theresa Tapp
602 Slaton Road
Lubbock, TX 79408

RE: MUR 1837

Dear Ms. Tapp:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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9004074363

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

P 920 407 443 564

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
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2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $—

3. ARTICLE ADDRESSED TO:
Mrs. theresa Tapp
602 Slaton Rd
Lubbock TX 79408

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943216

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-13-84

POSTMARK
LUBBOCK TEXAS
NOV 13 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Chester R. Upham, Jr.
P.O. Box 940
Mineral Wells, TX 76067

RE: MUR 1837

Dear Ms. Upham:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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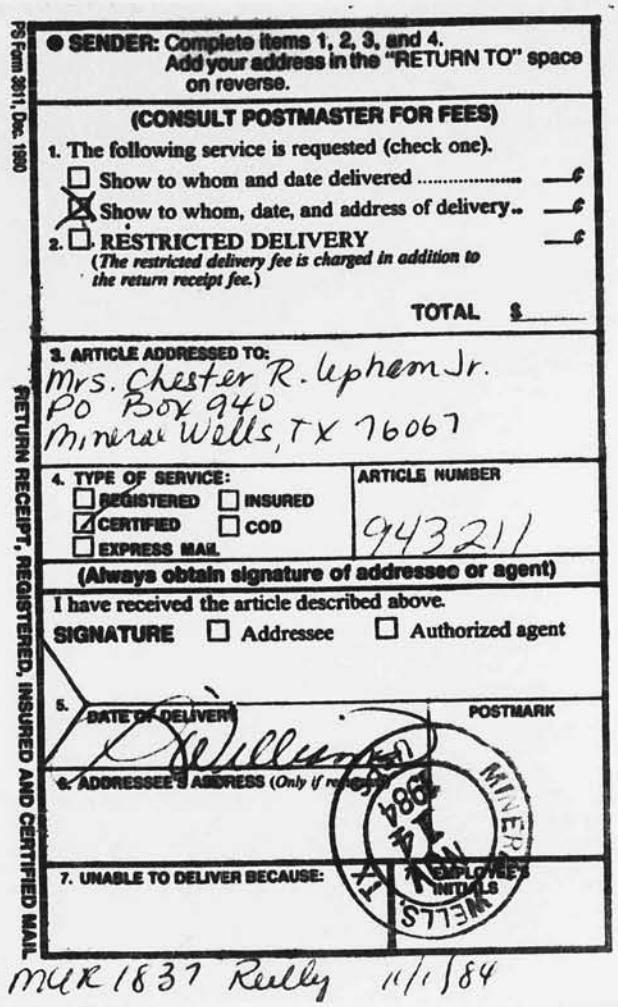
Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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(CONSULT POSTMASTER FOR FEES)

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☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $___

3. ARTICLE ADDRESSED TO:
Mrs. Chester R. Upham Jr.
PO Box 940
Mineral Wells, TX 76067

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943211

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
[signature]

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS

MINERAL WELLS, TX 76067 NOV 14 1984

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Esther Westby-Aus
1220 N.E. 17th, #6A
Portland, OR 97232

RE: MUR 1837

Dear Ms. Westby-Aus:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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2 2 0 4 0 7 4 4 3 6 7

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074436 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Dr. Robert V. West, Jr.
8700 Tesoro Drive
San Antonio, TX 78286

RE: MUR 1837

Dear Dr. West:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074369

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 3 2 0 4 0 7 4 4 3 7 0

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Dr. Robert V. West, Jr.
8700 Tesero Drive
San Antonio TX 78286

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943213

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY 11-9-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

POSTMARK U.S.P.S. NOV 9 1984

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Lellia Windom
1562 South Drive
Sarasota, FL 33579

RE: MUR 1837

Dear Ms. Windom:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

2 2 0 4 0 7 4 4 3 7 1

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

9 2 0 4 0 0 7 4 4 3 7 2

PS Form 3811, Dec. 1990

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Leilia Windom
1562 South Drive
Sarasota FL 33579

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943214

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
X Kay Bailey

5. DATE OF DELIVERY
11-9-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Robert L. Wheelock, Jr.
P.O. Box 1239
Corsicana, TX 75110

RE: MUR 1837

Dear Mr. Wheelock:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8204074437 3

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980 — RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☐ Show to whom, date, and address of delivery.. ¢
☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Robert L. Wheelock Jr.
PO Box 1239
Corsicana TX 75110

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943215

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
NOV 13 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Dr. Robert E. Windom
1562 South Drive
Sarasota, FL 33579

RE: MUR 1837

Dear Dr. Windom:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074375

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

3 2 7 4 0 7 4 4 3 7 6

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Dr. Robert E. Winkam
1562 South Drive
Sarasota, FL. 33579

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943216

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
X Kay Bailey

5. DATE OF DELIVERY 11-9-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. N.M. Yost
P.O. Box 678
Gainesville, TX 76240

RE: MUR 1837

Dear Mr. Yost:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074437 7

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. N M Yost
PO Box 678
Gainesville, TX 76240

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943217

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Mrs K B Yost

5. DATE OF DELIVERY
NOV 14 1984

POSTMARK
GAINESVILLE TX NOV 14 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS
TY

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. H.B. Zachry, Jr.
7603 Shadylane
San Antonia, TX 78209

RE: MUR 1837

Dear Ms. Zachry:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8204074379

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 7 4 4 3 8 0

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mrs. H. B. Zachry Jr.
7603 Shadey Lane
San Antonio, TX 78209

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943218

(Always obtain signature of addressee or agent)

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

5. Mrs H B Zachry Jr.

DATE OF DELIVERY
NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

SAN ANTONIO DELIVERY NOV 9 1984 USPS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. B.S. Baker
8636 LaFonte
Houston, TX 77024

RE: MUR 1837

Dear Mr. Baker:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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2204074438 1

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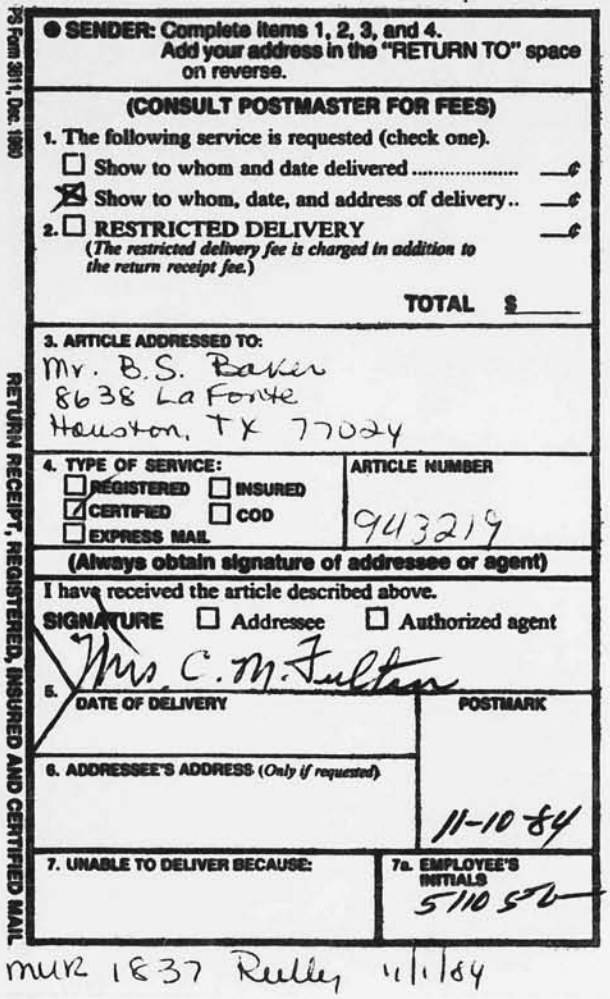
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mr. B.S. Baker
8638 La Fonte
Houston, TX 77024

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943219

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Mrs. C. M. Fulton

5. DATE OF DELIVERY

POSTMARK
11-10-84

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS
5110 5[illegible]

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. E.B. Bottom
1200 Elm
Mission, TX

RE: MUR 1837

Dear Mr. Bottom:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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9904074383

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

9904074438 4

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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(CONSULT POSTMASTER FOR FEES)

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☒ Show to whom, date, and address of delivery.. ¢
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(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. E B. Botham
1200 Elm
Mission, TX

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943222

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11/13/84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
1200 Elm

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Adelle Bottom
1200 Elm
Mission, TX

RE: MUR 1837

Dear Ms. Bottom:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074385

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

P 920 407 443 986

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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(CONSULT POSTMASTER FOR FEES)

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- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Adelle Bottom
1200 Elm
Mission, TX

3

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943222

(Always obtain signature of addressee or agent)

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

5.

DATE OF DELIVERY
11/13/84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
1200 Elm

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

mur 1837 Reilly 11/16/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Hogan T. Brooks
P.O. Box 1428
Conroe, TX 77305

RE: MUR 1837

Dear Mr. Brooks:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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2 9 0 4 0 7 4 4 3 9 7

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900744388

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery ..... —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $ ____

3. ARTICLE ADDRESSED TO:
Mr. Hogan T. Brooks
PO Box 1428
Conroe, TX 77305

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943223

(Always obtain signature of addressee or agent)

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

Henry T. Brooks

5. DATE OF DELIVERY
11-10-84

POSTMARK
CONROE NOV 10 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Fred Brown
P.O. Box 688
Mexia, TX 76667

RE: MUR 1837

Dear Mr. Brown:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074389

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

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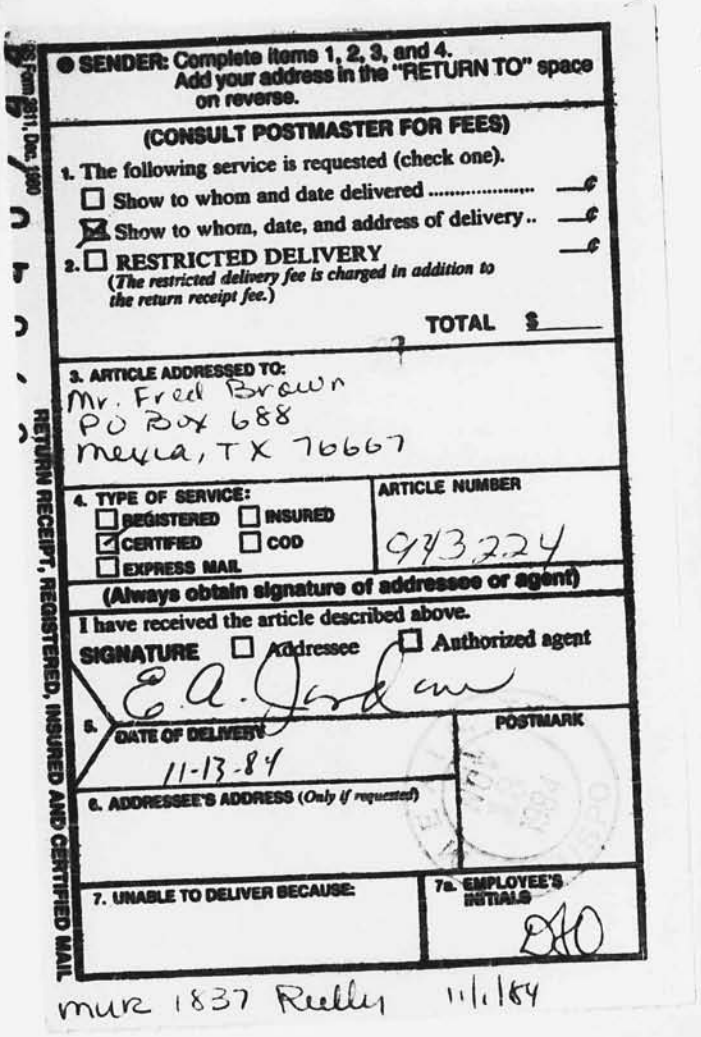
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Fred Brown
PO Box 688
Mexia, TX 76667

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943224

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-13-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS
DHO

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Sam Buchanan
P.O. Box 89
Texarkana, AR 75504

RE: MUR 1837

Dear Mr. Buchannan:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

2900744391

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

9004074443922

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Sam Buchanan
PO Box 89
Texarkana, TX 75504

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943225

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
NOV 10 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Douglas M. Conlee
Box 7247
Waco, TX 76710

RE: MUR 1837

Dear Mr. Conlee:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

9904074393

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 7 4 4 3 9 4

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ___¢
- ☒ Show to whom, date, and address of delivery.. ___¢
- 2. ☐ RESTRICTED DELIVERY ___¢
  (*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $___

3. ARTICLE ADDRESSED TO:
Mr. Douglas M. Conlee
Box 7247
Waco, TX 76710

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943226

(Always obtain signature of addressee or agent)

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

David Bagley

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7. EMPLOYEE'S INITIALS

WACO, TX WESTVIEW
NOV 14 1984
USPO

Reilly 11/1

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Michelle K. Connor
3020 Duke
Houston, TX 77005

RE: MUR 1837

Dear Ms. Connor:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074395

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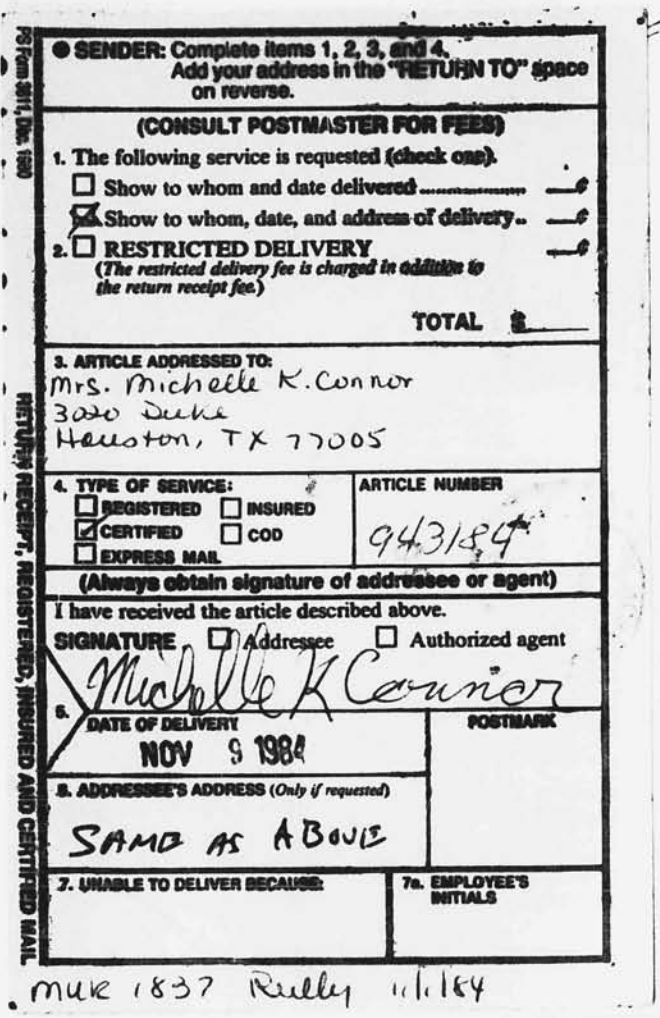
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $___

3. ARTICLE ADDRESSED TO:
Mrs. Michelle K. Connor
3020 Duke
Houston, TX 77005

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943184

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 9 1984

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
SAME AS ABOVE

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Harold D. Courson
Box 809
Perryton, TX 79070

RE: MUR 1837

Dear Mr. Courson:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074397

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

P 890 407 443

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Harold D. Courson
Box 809
Perryton, TX 79070

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943185

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Andrew Fasken
3140 Clark Lane
Paris, TX 75460

RE: MUR 1837

Dear Ms. Fasken:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074399

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Ames Lewis Connor III
3020 Duke
Houston, TX 77005

RE: MUR 1837

Dear Mr. Connor:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074400

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8204074401

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

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074402

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Bettye Nowlin
510 Hazelwood
Ft. Worth, Texas 76107

RE: MUR 1837

Dear Ms. Nowlin:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8204074403

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074404

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. L.D. Brinkman
2123 Sidney Baker Street
Kerrville, Texas 78028

RE: MUR 1837

Dear Mrs. Brinkman:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074405

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. L. D. Brinkman
2123 Sidney Baker Street
Kerrville, Tx 78028

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943238

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
POSTMARK
NOV 9 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:
7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

8200074404 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. C.J. Allen
P.O. Box 3902
Bryan, Texas 77805

RE: MUR 1837

Dear Mr. Allen:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8 2 0 4 0 7 4 4 4 0 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Tenneco Employees Good
Government Fund
A.J. Pate
P.O. Box 2511
Houston, Texas 77001

RE: MUR 1837

Dear Mr. Pate:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that Tenneco Employees Government Fund violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against Tenneco Employees Government Fund in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, Tenneco Employees Government Fund will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

9204074408

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074409

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

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8900744410

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Tenneco Employees Good Government
A.J. Pate
P.O. Box 2511
Houston TX 77001

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943183

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 12 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

HOUSTON TX 670 MS
NOV 12 1984

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1832 Reilly

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Bruce Calder
200 Hartford Building
Dallas, TX 75201

RE: MUR 1837

Dear Mr. Calder:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074411

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mr Bruce Calder
200 Hartford Building
Dallas, TX. 75201

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943066

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11/8/84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Arthur Cary
2519 Farrington
Dallas, TX 75207

RE: MUR 1837

Dear Mr. Cary:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8 9 0 4 0 7 4 4 4 1 3

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr Arthur Cary
2519 Farrington
Dallas, Tx 75207

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943067

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RECEIVED
1984

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Donald M. Carlton
4601 Cat Moutain Dr.
Austin, TX 78731

RE: MUR 1837

Dear Mr. Carlton:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074415

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Donald M. Carlton
4601 Cat Mountain Dr.
Austin, TX 78731

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943068

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11/1/84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 920 407 441

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Frank Cass
2727 Routh Street
Dallas, TX 75201

RE: MUR 1837

Dear Mr. Cass:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074417

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

3 9 0 4 0 7 4 4 4 1 8

mur 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Frank Cass
2727 ROUTH STREET
Dallas, TX 75201

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943069

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent
M. Jarrell

5. DATE OF DELIVERY
11-8

POSTMARK
RECEIVED
NOV 1984

6. ADDRESSEE'S ADDRESS (Only if requested)
2727 South

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. William G. Cass
2727 Routh Street
Dallas, TX 75201

RE: MUR 1837

Dear Mr. Cass:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074419

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. William B Cass
2727 Routh Street
Dallas, Tx 75201

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943070

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8

POSTMARK
NOV 9

6. ADDRESSEE'S ADDRESS (*Only if requested*)
2727 Routh

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Mary Cass
2727 Routh Street
Dallas, TX 75201

RE: MUR 1837

Dear Ms. Cass:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

3 9 0 4 0 7 4 4 4 2 1

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

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

mur 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Mary Cass
2727 Routh St.
Dallas, Tx 75201

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943071

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8

POSTMARK
REGISTERED

6. ADDRESSEE'S ADDRESS (Only if requested)
2727 Routh

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Michael L. Cass
2727 Routh Street
Dallas, TX 75201

RE: MUR 1837

Dear Mr. Cass:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074423

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

P 390 407 444

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1837 Reilly

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Michael L. Cass
2727 South Street
Dallas, TX 75201

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943072

(Always obtain signature of addressee or agent)

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

M Farrell

5. DATE OF DELIVERY
11-8

POSTMARK
RECEIVED

6. ADDRESSEE'S ADDRESS (Only if requested)
2727 South

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. W. Allen Custard
3703 Crescent Avenue
Dallas, TX 75205

RE: MUR 1837

Dear Mr. Custard:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074425

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. W. Allen Custard
3703 Crescent Ave.
Dallas, Tx 75205

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943073

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Mrs Wm A Custard

5. DATE OF DELIVERY
11-8

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
3703 Custard

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Dr. William H. Crain
2511 San Gabriel
Austin, TX 78705

RE: MUR 1837

Dear Dr. Crain:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074427

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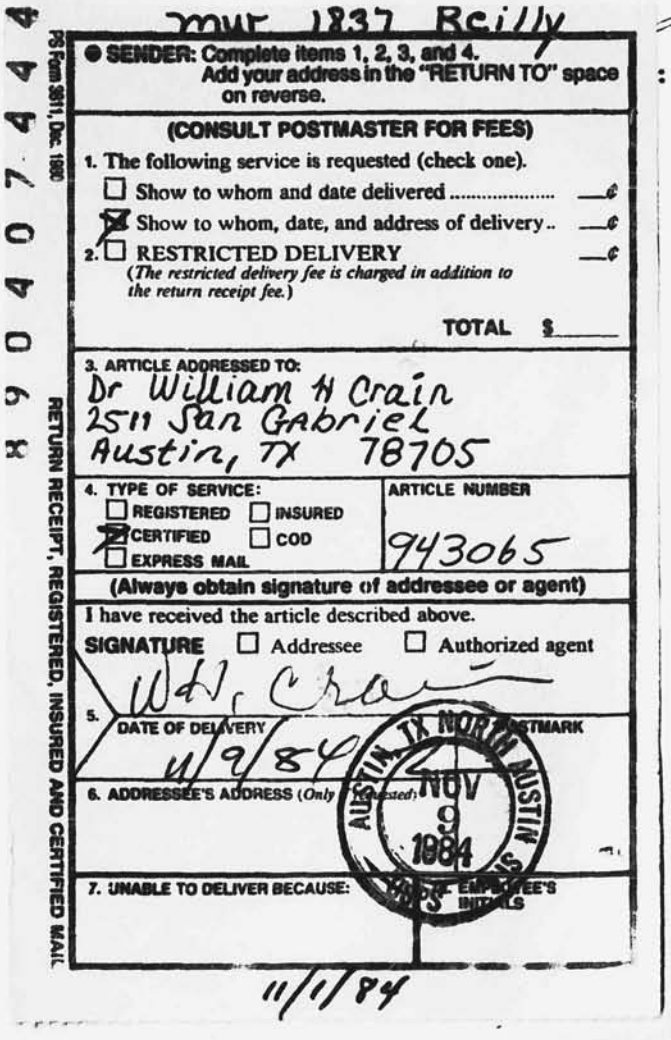
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

: Kenneth A. Gross
Associate General Counsel



MUR 1837 Reilly

8 9 0 4 0 7 4 4 4

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $_____

3. ARTICLE ADDRESSED TO:
Dr William H Crain
2511 San Gabriel
Austin, TX 78705

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943065

(Always obtain signature of addressee or agent)

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

5. W H Crain
DATE OF DELIVERY
11/9/84

POSTMARK
AUSTIN, TX NORTH AUSTIN STA
NOV 9 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Roy C. Coffee
6201 Hillcrest
Dallas, TX 75205

RE: MUR 1837

Dear Mr. Coffee:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8 9 0 4 0 7 4 4 4 2 9

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Roy C. Coffee
6201 Hillcrest
Dallas, TX 75205

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943064

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8

POSTMARK
RECEIVED NOV 6 1984 P.M.

6. ADDRESSEE'S ADDRESS (Only if requested)
6201 Hillcrest

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Hugh Halff, Jr.
3355 Cherry Ridge Road
Suite 201
San Antonia, TX 78230

RE: MUR 1837

Dear Mr. Halff:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074431

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr Hugh Halff Jr.
3355 Cherry Ridge Road
Suite 201
San Antonio, TX 78230

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943063

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY NOV 1984

POSTMARK
SAN ANTONIO, TX MEDICAL CTR. USPO NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS

11/14/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Frank Glover
P.O. Box 287
Mt. Pleasant, TX 75455

RE: MUR 1837

Dear Mr. Glover:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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2004074433

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Frank Glover
P.O. Box 281
Mt. Pleasant, TX 75455

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943062

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if r

POSTMARK
USPO MT. PLEASANT, TX NOV 9 1984

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MA

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. A. Don Lummus
1413 Amazon
Plano, TX 75075

RE: MUR 1837

Dear Mr. Lummus:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074433

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900744436

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. A. Don Lummus
1413 Amazon
Plano, TX 75075

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943095

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent
X A. D. Lummus

5. DATE OF DELIVERY
11-9-84

6. ADDRESSEE'S ADDRESS (Only if requested)
SAME AS ABOVE

PLANO TX WHOLESALE STA NOV 9 1984 USPO

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. R.R. Lowdon
2727 West Seventh Street
Fort Worth, TX 76107

RE: MUR 1837

Dear Mr. Lowdon:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8204074437

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8204074438

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Frank Mayborn
10 South 3rd Street
Temple, TX 76501

RE: MUR 1837

Dear Mr. Mayborn:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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9204074439

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $___

3. ARTICLE ADDRESSED TO:
Mr. Frank W. Mayborn
10 South 3rd Street
Temple, Tx 76501

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943093

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11/8/84

POSTMARK

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

EMPLE

11/1/84

8 9 0 4 0 7 4 4 4 4 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Frank W. Mayborn
10 South 3rd
Temple, TX 76501

RE: MUR 1837

Dear Ms. Mayborn:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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3 2 0 4 0 7 4 4 4 4 1

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900744442

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Frank W Mayborn
10 South 3rd
Temple, TX 76501

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943092

(Always obtain signature of addressee or agent)

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

DATE OF DELIVERY
11/8/84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Carolyn McElyea
P.O. Box 1167
Crockett, TX 75835

RE: MUR 1837

Dear Ms. McElyea:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

2204074443

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

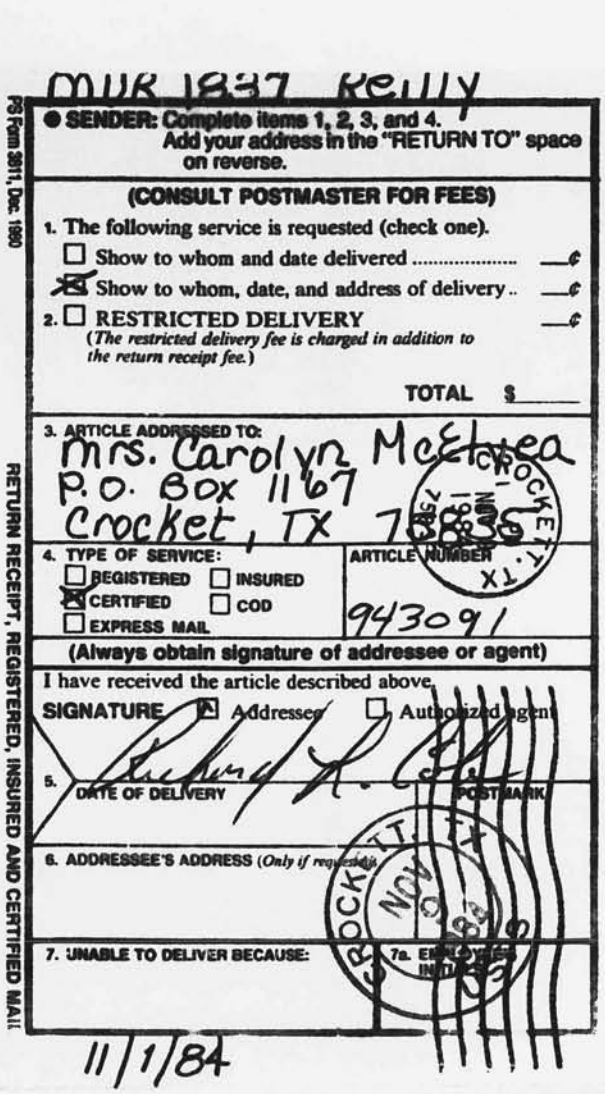
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Carolyn McElvea
P.O. Box 1167
Crocket, TX 75835

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943091

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 290 407 444

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Gen. Sam Maddux, Jr.
500 Alemeda Circle
San Antonio, TX 78212

RE: MUR 1837

Dear Mr. Maddux:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074445

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Gen. Sam. Maddux, Jr.
800 Alameda Circle
San Antonio, TX 78212

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943090

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 7 1984

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Geraldine Miller
2001 Bryan Tower, 30th Floor
Dallas, TX 75201

RE: MUR 1837

Dear Ms. Miller:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074447

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs Geraldine Miller
2001 Bryan Tower, 30th fl.
Dallas, TX 75201

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943089

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8-84

POSTMARK
RECEIVED

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Vance C. Miller
2001 Bryan Tower 30th Floor
Dallas, TX 75201

RE: MUR 1837

Dear Mr. Miller:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074449

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Vance C. Miller
2001 Bryan Tower, 30th fl.
Dallas, TX 75201

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943088

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. L.A. McNeil
P.O. Box 2928
Corpus Christi, TX 78403

RE: MUR 1837

Dear Mr. McNeil:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8204074451

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 7 4 4 4 5 2

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ___¢
- ☒ Show to whom, date, and address of delivery.. ___¢

2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mr. L. A. McNeil
P.O. Box 2928
Corpus Christi, TX 78403

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943087

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Elva P. Cao

5. DATE OF DELIVERY

POSTMARK

CORPUS CHRISTI, TX DOWNTOWN STA. USPO NOV 8 1984

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS
Am

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Montana McKean
P.O. Box 1169
Seguin, TX 78155

RE: MUR 1837

Dear Mr. McKean:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074453

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8904074454

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr Montana McKean
P.O. Box 1169
Seguin, TX 78155

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
P 943086

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8-84

POSTMARK
NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS
VM

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. A.P. McEvoy
6301 Preston Parkway
Dallas, TX 75205

RE: MUR 1837

Dear Mr. McEvoy:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8204074455

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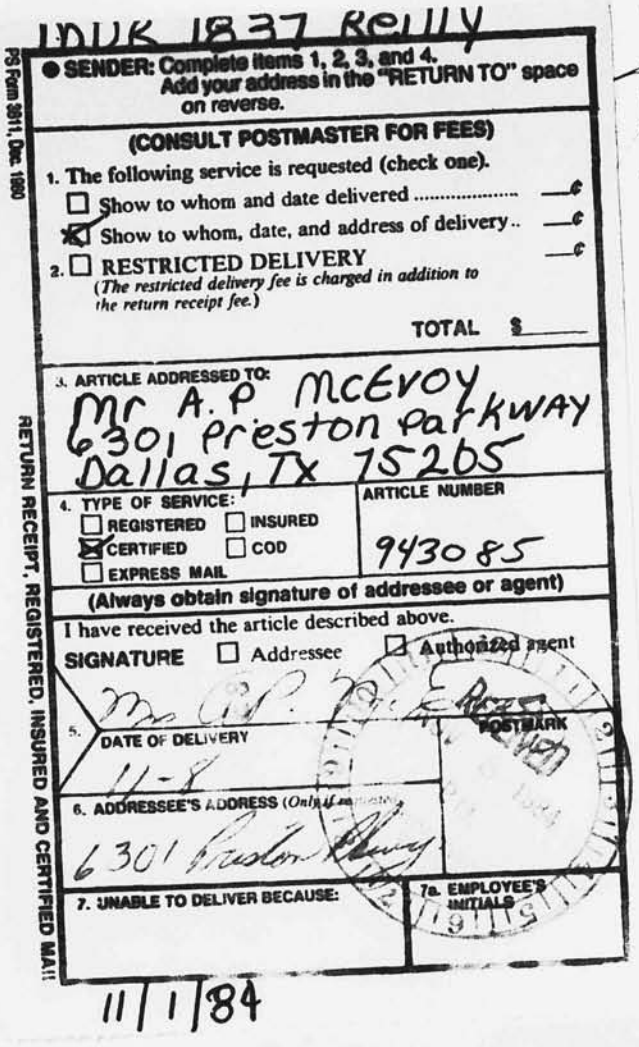
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



IDUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $___

3. ARTICLE ADDRESSED TO:
Mr A.P McEvoy
6301 Preston Parkway
Dallas, Tx 75205

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943085

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
6301 Preston Pkwy

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

8 9 0 4 0 7 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Ms. Catherine W. McAnally
620 S. Taylor
Amarillo, TX 79101

RE: MUR 1837

Dear Ms. McAnally:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074457

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 REILLY

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Ms. Catharine W. McAnally
620 S. Taylor
Amarillo, Tx 79101

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943084

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7A. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Walter M. Mischer
P.O. Box 7479
Houston, TX 77008

RE: MUR 1837

Dear Mr. Mischer:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074459

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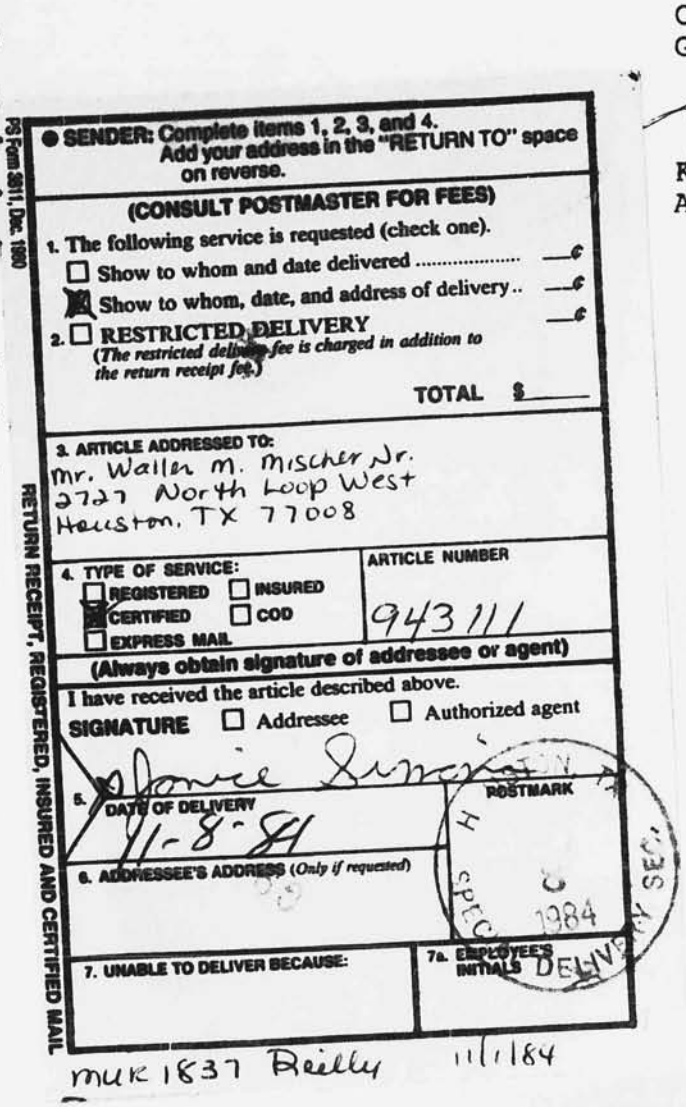
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Waller M. Mischer Jr.
2727 North Loop West
Houston, TX 77008

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943111

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8-84

POSTMARK
NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 390 400 744

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. William H. Martin
1804 1st Natl. Bank Bldg.
Midland, TX 79701

RE: MUR 1837

Dear Mr. Martin:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

3 9 0 4 0 7 4 4 4 6 1

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ___¢
- ☒ Show to whom, date, and address of delivery.. ___¢
- 2. ☐ RESTRICTED DELIVERY ___¢
  (*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mr. William H. Martit
1804 1st National Bank Bldg.
Midland, TX 79701

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943082

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Regina Sanders

5. DATE OF DELIVERY
11-8-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/2/84

8 9 0 4 0 7 4 4 4 6 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Karen Martin
1404 Country Club Drive
Midland, TX 79701

RE: MUR 1837

Dear Ms. Martin:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074463

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
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☑ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Karen Martin
1404 Country Club Drive
Midland, TX 79701

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943144

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-9-84
POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:
7a. EMPLOYEE'S INITIALS

NOV 1984

11/2/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 290 407 443

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Carl E. Oates
6924 Stefani
Dallas, TX 75225

RE: MUR 1837

Dear Ms. Oates:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074465

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 7 4 4 4 6 6

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
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- ☒ Show to whom, date, and address of delivery .. ___¢
- 2. ☐ RESTRICTED DELIVERY ___¢
  (*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mrs. Carl E. Oates
6924 Stefani
Dallas, TX 75225

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943143

(Always obtain signature of addressee or agent)

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

Carl W. Oates

5. DATE OF DELIVERY

POSTMARK
DALLAS TX PRESTON ST
NOV 1984

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/2/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Carl E. Oates
6924 Stefani
Dallas, TX 75225

RE: MUR 1837

Dear Mr. Oates:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074467

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr Carl E Oates
6924 Stephani
Dallas, TX 75225

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943142

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
DALLAS, TX PRESTON ST
NOV 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/2/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Gene E. Overbeck
1101-17th Street, N.W.
Washington, DC 20036

RE: MUR 1837

Dear Mr. Overbeck:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074469

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8204074470

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. C.O. Overcash
3850 Bellaire Circle
Forth Worth, TX 76109

RE: MUR 1837

Dear Mr. Overcash:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074471

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
C. O. Overcash
3850 Bellaire Circle
FortWorth, TX 76109

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943140

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-9-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Daniel T. Parker
P.O. Box 107
Houston, TX 77001

RE: MUR 1837

Dear Mr. Parker:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074473

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
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☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr Daniel T. Parker
P. O. Box 107
Houston, TX 77001

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943139

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK HOUSTON, TEXAS U.S.P.O. NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/8/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 290 407 444

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Ms. Anne Pickens
3926 Potomac
Dallas, TX 75206

RE: MUR 1837

Dear Ms. Pickens:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074475

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
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☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Ms. Anne Pickens
3926 Potomac
Dallas, TX, 75205

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943138

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8

POSTMARK
RECEIVED
NOV 6 1984

6. ADDRESSEE'S ADDRESS (Only if requested)
3926 Potomac

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Ms. Paige Pickens
3926 Potomac
Dallas, TX 75205

RE: MUR 1837

Dear Ms. Pickens:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074477

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)
TOTAL $—

3. ARTICLE ADDRESSED TO:
Ms. Paige Pickens
3926 Potomac St.
Dallas, TX 75205

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943137

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8

POSTMARK
RECEIVED
1984

6. ADDRESSEE'S ADDRESS (*Only if requested*)
3926 Potomac

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Elga Rea
5305 Mariners Drive
Plano, TX 75075

RE: MUR 1837

Dear Ms. Rea:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074479

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900744480

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Elga Rea
5305 Mariners Drive
Plano, Tx 75075

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943136

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
PLANO, TX USA
10 NOV 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

USPO

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Hon. Eugene M. McElyea
P.O. Box 1167
Crockett, TX 75835

RE: MUR 1837

Dear Hon. McElyea:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074481

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

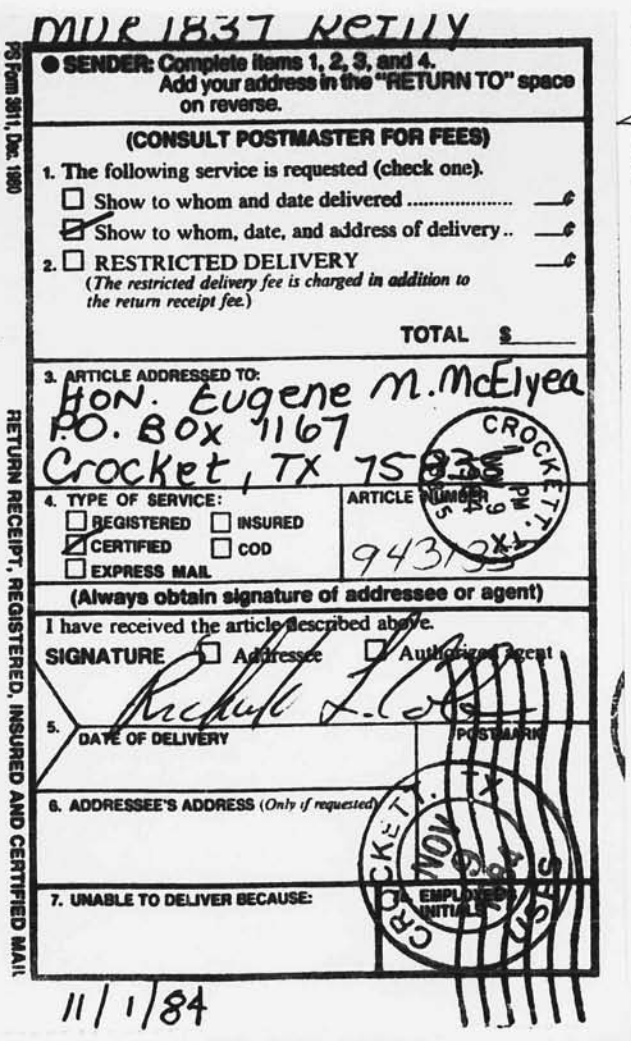
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☑ Show to whom, date, and address of delivery .. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
HON. Eugene M. McElyea
P.O. BOX 1167
Crocket, TX 75835

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943135

CROCKETT, TX NOV 9 1984 USPS

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY | POSTMARK

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE: | 8. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. John H. White
P.O. Box 16309
San Antonia, TX 78216

RE: MUR 1837

Dear Mr. White:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

9904074493

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900074444984

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. John H White
PO Box 16309
San Antonio, TX 78216

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943133

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11/8/84

6. ADDRESSEE'S ADDRESS (Only if requested)
800 Isom Rd

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

POSTMARK
SAN ANTONIO, TX. RANDOLPH AFB STA.
NOV 8 1984
USPS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Thomas M. Benson, Jr.
9400 San Pedro
San Antonia, TX 78216

RE: MUR 1837

Dear Mr. Benson:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074485

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

P 890 074 485

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
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(CONSULT POSTMASTER FOR FEES)

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☐ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $ —

3. ARTICLE ADDRESSED TO:
Mr. Thomas M. Benson
9400 San Pedro
San Antonio, TX 78216

SAN ANTONIO, TX NOV 1 PM 1984

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943132

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY NOV 7 1984

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Robert J. Bruni
6326 Sovereign Drive
Suite 250-2
San Antonia, TX 78229

RE: MUR 1837

Dear Mr. Bruni:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074447

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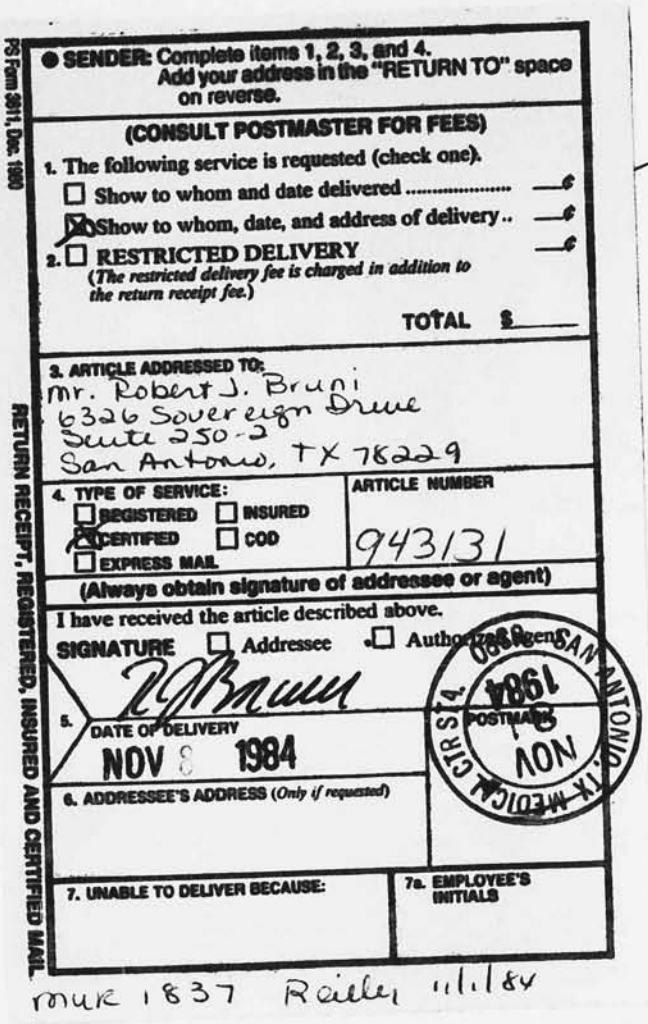
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Robert J. Bruni
6326 Sovereign Drive
Suite 250-2
San Antonio, TX 78229

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943131

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized Agent
R J Bruni

5. DATE OF DELIVERY
NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

SAN ANTONIO, TX MEDICAL CTR STA. POSTMARK NOV 1984

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 890 074 443

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. P. Gill
P.O. Box 599
San Antonia, TX 78292

RE: MUR 1837

Dear Mr. Gill:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8204074489

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

P 290 407 444

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☐ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. P. Gill
PO Box 599
San Antonio, TX 78292

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943130

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 8 1984

POSTMARK
SAN ANTONIO TX DOWNTOWN
USPS

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Edith Huebner
P.O. Drawer 20350
San Antonia, TX 78286

RE: MUR 1837

Dear Ms. Huebner:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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2004074491

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 0 7 4 4 4 9 2

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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☐ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs Edith Huebner
PO Drawer 20350
San Antonio, TX 78286

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943129

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY NOV 8 1984

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Dr. R.A. Fox
2604 Jarratt
Austin, TX 78703

RE: MUR 1837

Dear Dr. Fox:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074493

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900407404

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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(CONSULT POSTMASTER FOR FEES)

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2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Dr. R. A. Box
2604 Jarratt
Austin, TX 78703

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943128

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X [signature]

5. DATE OF DELIVERY
11-10-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Gene F. Canavan
P.O. Box 16007
San Antonia, TX 78216

RE: MUR 1837

Dear Mr. Canavan:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074495

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered .....
☒ Show to whom, date, and address of delivery
2. ☐ RESTRICTED DELIVERY
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Gene F. Canavan
P.O. Box 16007
San Antonio, TX 78216

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943127

(Always obtain signature of addressee or agent)

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

Warren Vincent

5. DATE OF DELIVERY
11-8-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

8904027

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Ernest Bel Fay
2304-1st City Natl. Bank
Houston, TX 77002

RE: MUR 1837

Dear Mr. Fay:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074497

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900074449 8

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☐ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Ernest Bel Fay
2304 - 1st City Hall Bank
Houston, TX 77002

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943126

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
HOUSTON TX
NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. George S. Hawn
101 N. Shoreline
Corpus Christi, TX 78401

RE: MUR 1837

Dear Mr. Hawn:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074499

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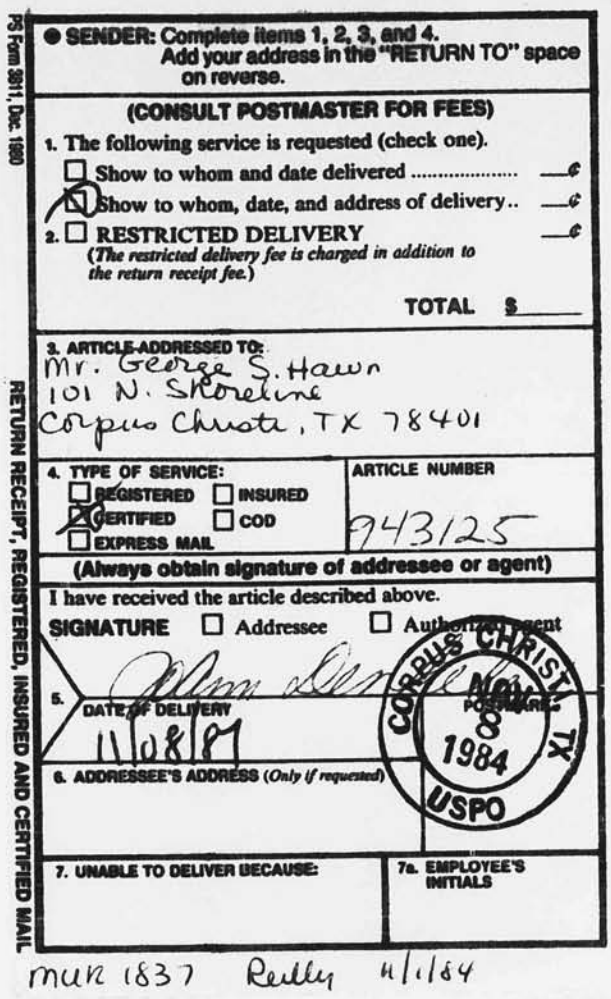
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



8 9 0 4 0 7 4 4 5 0 0

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mr. George S. Hawn
101 N. Shoreline
Corpus Christi, TX 78401

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943125

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11/08/84

POSTMARK
CORPUS CHRISTI TX
NOV 8 1984
USPO

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. H.L. Hunt
1401 InterFirst One
Dallas, TX 75202

RE: MUR 1837

Dear Ms. Hunt:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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9204074501

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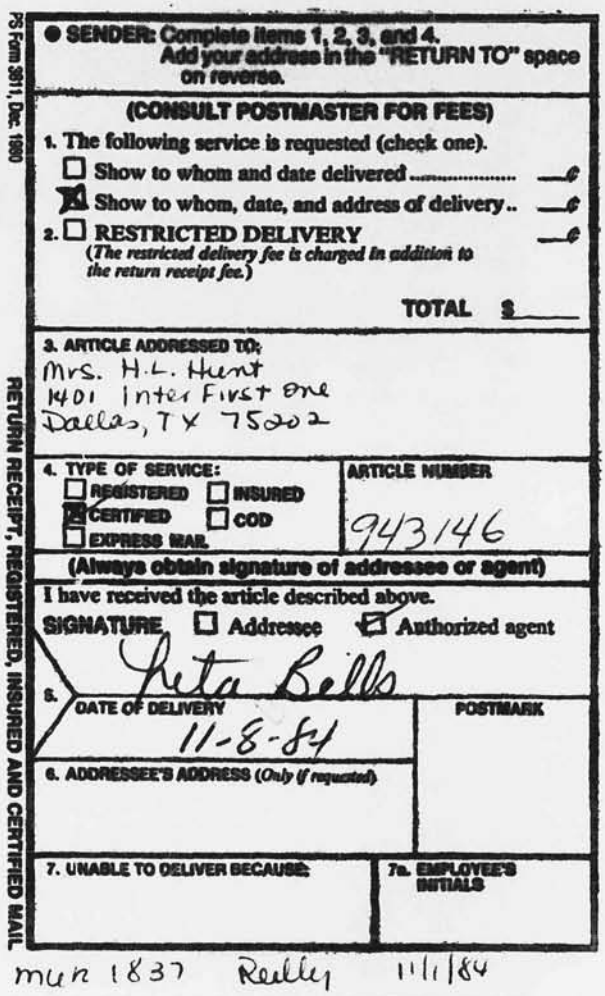
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. H.L. Hunt
1401 Inter First One
Dallas, TX 75202

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943146

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 890 407 445

mur 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Ray L. Hunt
1401 InterFirst One
Dallas, TX 75202

RE: MUR 1837

Dear Mr. Hunt:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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2904074503

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Ray L. Hunt
1401 Inter First One
Dallas, TX 75202

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943145

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Nancy A. Hunt
1401 InterFirst One
Dallas, TX 75202

RE: MUR 1837

Dear Ms. Hunt:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8204074450

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

P 920 407 452

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs Nancy A. Hunt
1401 Inter First One
Dallas, TX 75202

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943080

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. J.I. Jackson
3880 Hulen Street, Suite 329
Fort Worth, TX 76107

RE: MUR 1837

Dear Mr. Jackson:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074507

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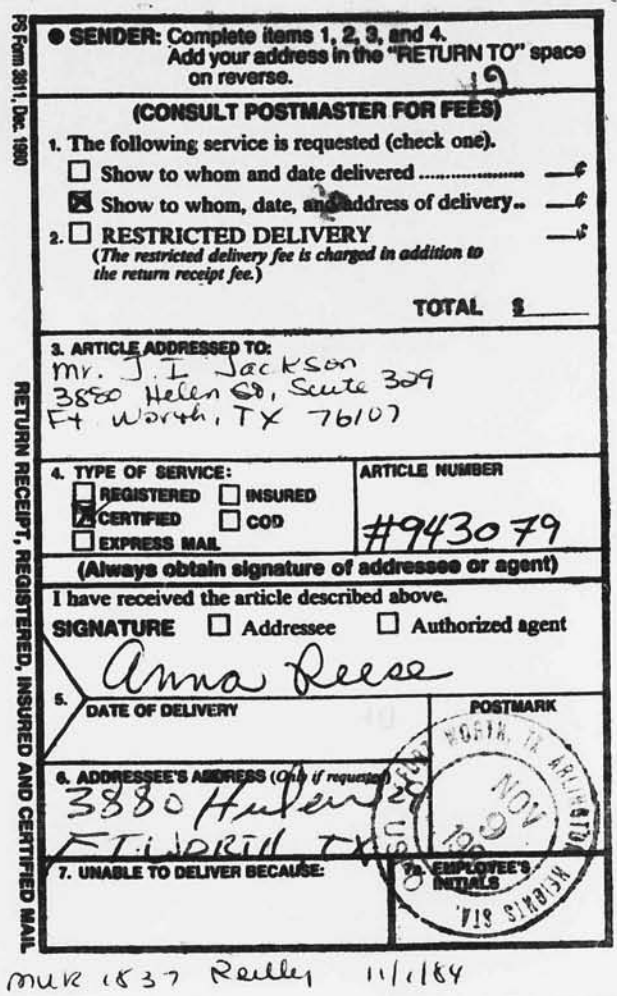
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



8 9 0 4 0 7 4 4 5 0 8

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery.. —¢

2. ☐ RESTRICTED DELIVERY —¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. J. I. Jackson
3880 Helen St, Suite 329
Ft Worth, TX 76107

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
#943079

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

5. Anna Reese

DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
3880 Helen St
FT. WORTH TX

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Abe M. Katz
P.O. Box 1436
Corpus Christi, TX 78403

RE: MUR 1837

Dear Mr. Katz:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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9904074509

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Frederick R. Meyer
5830 Averill Way
Dallas, TX 75225

RE: MUR 1837

Dear Mr. Meyer:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074510

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

2204074451 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Drayton McLane, Jr.
P.O. Box 927
Temple, TX 76501

RE: MUR 1837

Dear Ms. McLane:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8204074512

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Robert L. Bradley
4200 Texas Commerce Tower
Houston, TX 77002

RE: MUR 1837

Dear Mr. Bradley:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074513

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

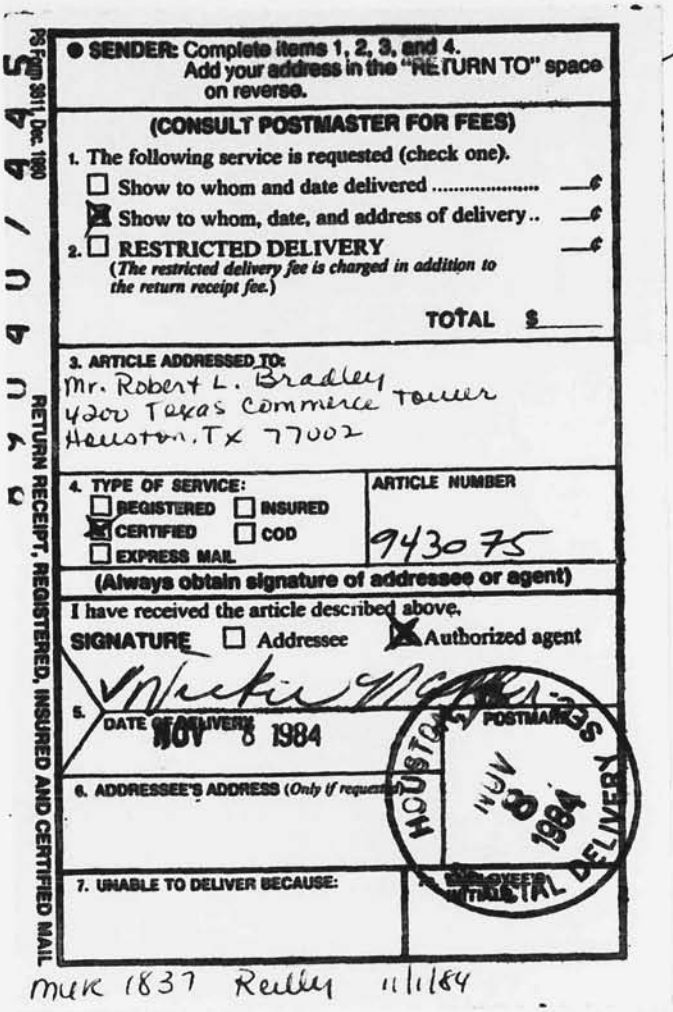
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery .. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $___

3. ARTICLE ADDRESSED TO:
Mr. Robert L. Bradley
4200 Texas Commerce Tower
Houston, Tx 77002

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943075

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY NOV 8 1984

POSTMARK HOUSTON SEC. NOV 8 1984 DELIVERY

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUK 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Refugio Gonzales, Jr.
8830 Huffsmith Road
Tomball, TX 77375

RE: MUR 1837

Dear Mr. Gonzales:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074515

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

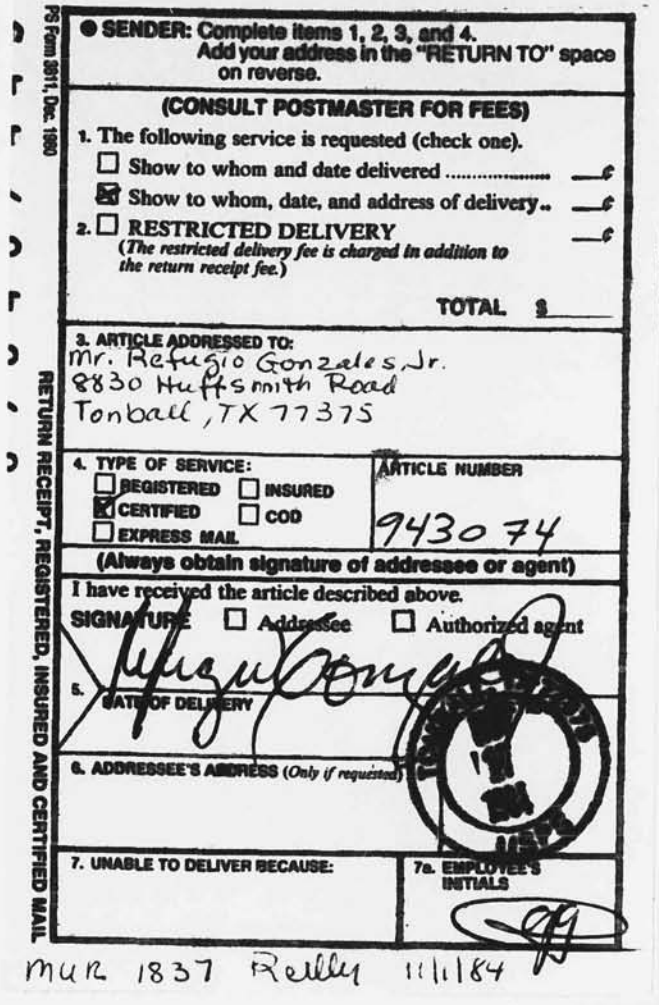
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Refugio Gonzales, Jr.
8830 Huffsmith Road
Tonball, TX 77375

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943074

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Walier M. Mischer, Jr.
2727 North Loop West
Houston, TX 77008

RE: MUR 1837

Dear Mr. Mischer:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074517

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074518

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Anita Rogers
P.O. Box 1077
Edinburg, TX 78539

RE: MUR 1837

Dear Ms. Rogers:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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9204074519

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mrs. Anita Rogers
PO Box 1077
Edinburg, TX 78539

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943110

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY NOV 8 1984

POSTMARK
EDINBURG TX
8
1984
USPS

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS
W

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. G.W. Sanford
1803 Denton Drive
Carrollton, TX 75006

RE: MUR 1837

Dear Mr. Sanford:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074521

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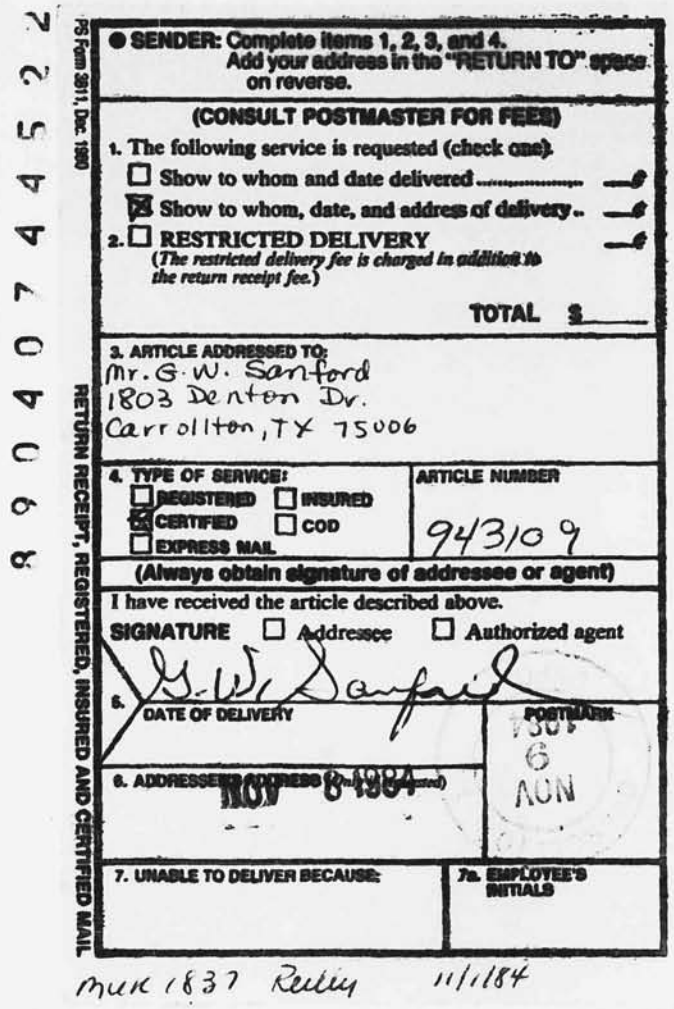
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

8 9 0 4 0 7 4 4 5 2 2

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. G.W. Sanford
1803 Denton Dr.
Carrollton, TX 75006

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943109

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
5. G.W. Sanford

DATE OF DELIVERY

POSTMARK
NOV 6 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Frank J. Scanio, Jr.
LaRosa Ranch
Woodsboro, TX 78393

RE: MUR 1837

Dear Mr. Scanio:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074523

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Frank J. Scanio, Jr.
La Rosa Ranch
Woodsboro, TX 76393

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943108

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8-84

POSTMARK
NOV

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Ross Workman
P.O. Box 1396
Houston, TX 77251

RE: MUR 1837

Dear Mr. Workman:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074525

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Ross Workman
PO Box 1396
Houston, TX 77251

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943107

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY NOV 9 1984

POSTMARK
HOUSTON, TX GPO WS
NOV 9 1984
USPO

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Mildred W. Simmons
P.O. Box 186
Imperial, TX 79743

RE: MUR 1837

Dear Ms. Simmons:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8204074527

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980 — RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs Mildred W. Simmons
PO Box 186
Imperial, TX 79743

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943106

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-9-84

IMPERIAL TX
NOV 9 1984

6. ADDRESSEE'S ADDRESS (Only if requested)
Box 186
Imperial, Tx. 7974

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

P 943 106 452

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Edith Jones O'Donnell
3355 Interfirst One
Dallas, TX 75202

RE: MUR 1837

Dear Ms. O'Donnell:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074529

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

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Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $—

3. ARTICLE ADDRESSED TO:
Mrs Edith Jones O'Donnell
3306 Interfirst One
Dallas, Texas 75202

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943105

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY 11-8-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Houston Industries Political
Action Committee
P.O. Box 1700
611 Walker Street
Houston, TX 77001

RE: MUR 1837

Dear Madam or Sir:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that Houston Industries Political Action Committee violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against Houston Industries Political Action Committee in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, Houston Industries Political Action Committee will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

9204074531

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

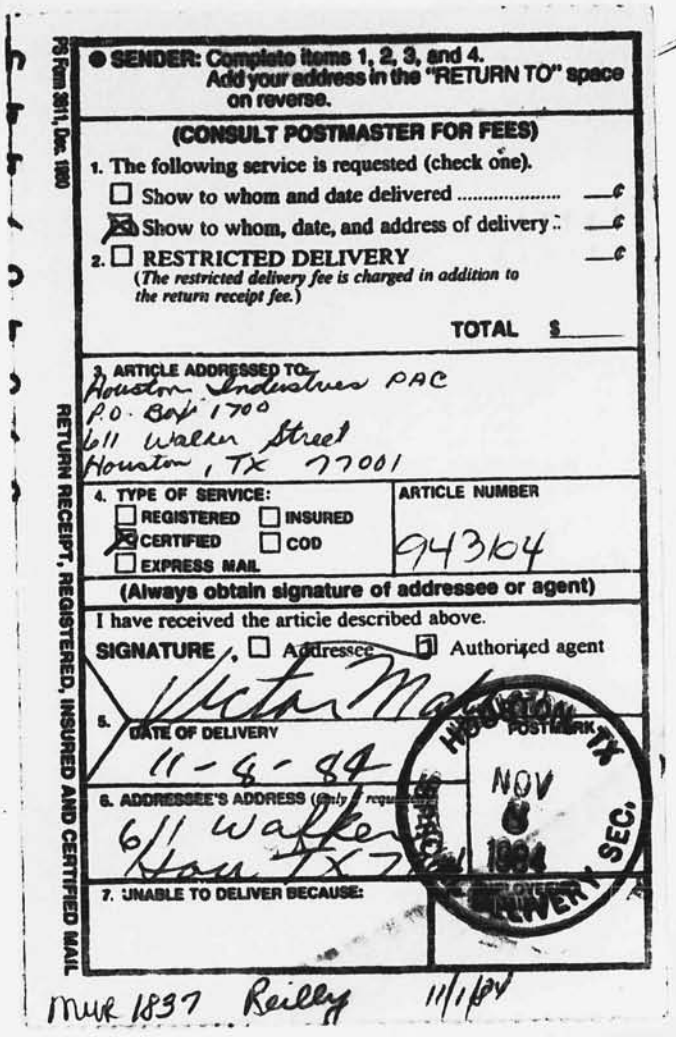
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Houston Industries PAC
P.O. Box 1700
611 Walker Street
Houston, TX 77001

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943104

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8-84

6. ADDRESSEE'S ADDRESS (Only if requested)
611 Walker
Hou TX 77

HOUSTON TX POSTMARK NOV 8 1984 SEC.

7. UNABLE TO DELIVER BECAUSE:

DELIVERY

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

National Home Builders PAC
15th & M Streets, NW
Washington, D.C. 20005

RE: MUR 1837

Dear Madam or Sir:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that National Home Builders PAC violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against National Home Builders PAC in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, National Home Builders PAC will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074453 3

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074534

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

National Federation of Independent
Business
150 W. 20th Avenue
San Mateo, CA 94403

RE: MUR 1837

Dear Madam or Sir:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that National Federation of Independent Business violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against National Federation of Independent Business in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, National Federation of Independent Business will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074535

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☐ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
National Federation of Independent Business
150 W. 20th Ave
San Mateo, CA 94403

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943102

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:
7a. EMPLOYEE'S INITIALS

MUR 1027 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Texas Republican Congressional
Committee
Mr. John Nolan
P.O. Box 855
Austri, TX 78767

RE: MUR 1837

Dear Mr. Nolan:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that Texas Republican Congressional Committee violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against Texas Republican Congressional Committee in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, Texas Republican Congressional Committee will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074445 37

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Texas Rec.
John Nolan
P.O. Box 855
Austin TX 78767

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943101

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
8

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

American Bankers Association Bank PAC
Brian M. Meyer
1120 Connecticut Avenue
Washington, D.C. 20036

RE: MUR 1837

Dear Mr. Meyer:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that American Bankers Association Bank PAC violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against American Bankers Association Bank PAC in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, American Bankers Association Bank PAC will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

2907445539

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074445440

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

American Family PAC
Box 1480
Attn: John Amos
Columbus, GA 31902

RE: MUR 1837

Dear Mr. Amos:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that American Family PAC violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against American Family PAC in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, American Family PAC will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074541

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
American Family PAC
Box 1480
Attn: John Amos
Columbus GA 31902

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943099

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
GMF COLUMBUS GA
NOV 8 198

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

MUR 1837 Reilly 11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Union Pacific Fund
1120 20th Street, NW
One LaFayette Center
Washington, D.C. 20026

RE: MUR 1837

Dear Madam or Sir:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that Union Pacific Fund violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against Union Pacific Fund in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, Union Pacific Fund will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8204074454543

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. L.D. Burns
One Parker Square
Suite #500
Wichita Falls, TX 00817

RE: MUR 1837

Dear Mr. Burns:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8204074454

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. L. D. BURNS
One Parker Square
Suite 500
Wichita Falls, TX 00817

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943097

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-9-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS
JM

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. George W. Bush
17630 Davenport Road
Dallas, TX 75252

RE: MUR 1837

Dear Mr. Bush:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074545 6

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

8 9 0 4 0 7 4 4 5 4 7

PS Form 3811, Dec. 1990

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. George W. BUSH
17630 Davenport Road
Dallas, TX 75252

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☒ EXPRESS MAIL

ARTICLE NUMBER
943081

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
POSTMARK

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:
7a. EMPLOYEE'S INITIALS

11/1/84

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

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074548

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Elloine M. Calder
265 Hartford Building
Dallas, TX 75201

RE: MUR 1837

Dear Ms. Calder:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074549

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Elloine M. Calder
165 Hartford Building
Dallas, TX. 75201

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943096

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY 11/8/84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 904 074 550

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. David Crowley
10265 Inwood Road
Dallas, TX 75229

RE: MUR 1837

Dear Mr. Crowley:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074551

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

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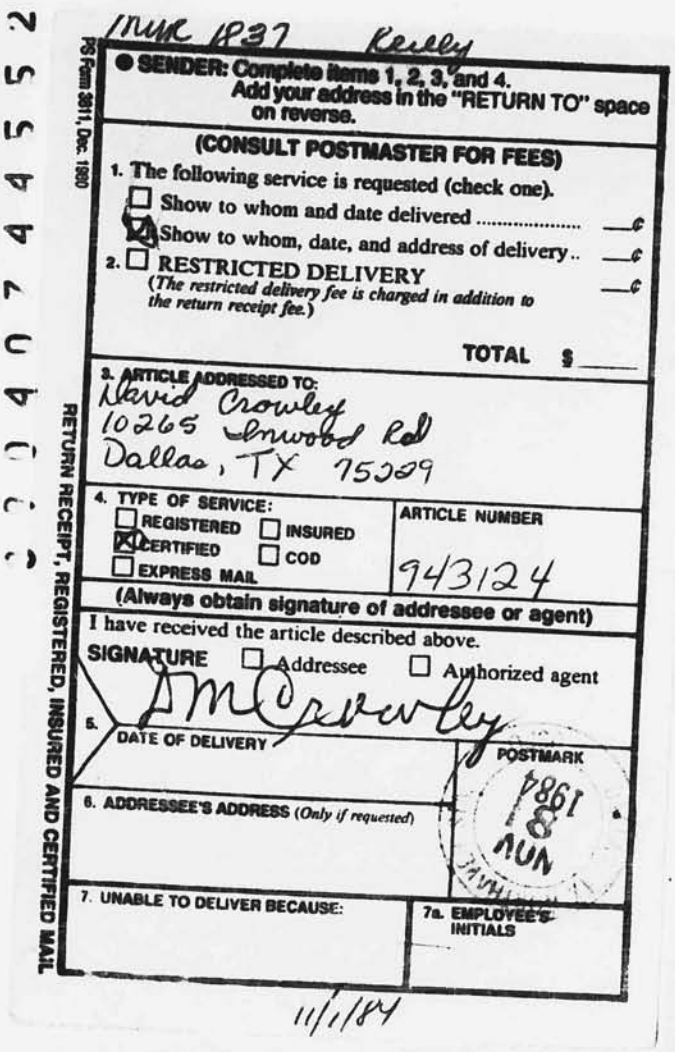
If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
David Crowley
10265 Inwood Rd
Dallas, TX 75229

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943124

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 201 074 552

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. John Stemmons
2700 Stemmons Freeway
Dallas, TX 25207

RE: MUR 1837

Dear Mr. Stemmons:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074455 3

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900407445554

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... —¢
- ☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
John Stemmons
2700 Stemmons Freeway
Dallas, TX 25207

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943123

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8-84

POSTMARK

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Maragret Allen
3011 N. Main
Victoria, TX 77901

RE: MUR 1837

Dear Ms. Allen:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

R 9040744555

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074455 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Alvis Arthur
1711 N. Beltline Road
P.O. Box 153648
Irving, TX 75015

RE: MUR 1837

Dear Mr. Arthur:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074557

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Alvis Arthur
1711 N. Beltline Road
P.O. Box 153648
Irving, Texas 75015

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943121

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
POSTMARK
FEC MAIN OFFICE NOV 2 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:
7a. EMPLOYEE'S INITIALS

11/1/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 894 [illegible]

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. James W. Arnold
P.O. Box 6566
Tyler, TX 75711

RE: MUR 1837

Dear Mr. Arnold:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074559

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900407445560

MUR 1837 Reilly

SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr James W. Arnold
P.O. Box 6566
Tyler, Tx 75711

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943120

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY — POSTMARK
TYLER, TX STA. A NOV 9 1984 USPS

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE: — EMPLOYEE'S INITIALS

11/1/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Dr. William L. Anderson
P.O. Box 539
Addison, TX 75001

RE: MUR 1837

Dear Dr. Anderson:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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2074561

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Dr. William L. Anderson
P.O. Box 539
Addison, TX 75001

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943119

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
USPO NOV 9 1984 AON

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Helen Allen
3207 Groveland Lane
Houston, TX 77019

RE: MUR 1837

Dear Ms. Allen:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074563

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1897 REILLY

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Helen Allen
3207 Groveland Lane
Houston, TX 77019

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
743118

(Always obtain signature of addressee or agent)

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

5. Helen Allen

DATE OF DELIVERY
11/8/84

POSTMARK
HOUSTON, TX NOV 8 SPECIAL DELIVERY SEC.

6. ADDRESSEE'S ADDRESS (Only if requested)
3207 Groveland

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Roland Arthur
1711 North Beltline Road
Irving, TX 75015

RE: MUR 1837

Dear Mr. Arthur:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900744566

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Roland Arthur
1711 North Beltline Road
Irving, Texas 75015

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943117

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11/8/84

POSTMARK
IRVING, TX MAIN OFFICE NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS USPO

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Ebby Halliday Acers
5999 W. Northwest Highway
Dallas, TX 75225

RE: MUR 1837

Dear Ms. Acers:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074457

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074568

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Helen Bankston
4747 LBJ Freeway
Dallas, TX 75234

RE: MUR 1837

Dear Ms. Bankston:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

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8904074569

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs Helen Bankston
4747 LBJ FREEWAY
Dallas, Tx 75234

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943115

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
8 NOV 84

POSTMARK
DALLAS TX NORTHAVEN STA
8 NOV 1984
USPO

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

8200744570

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Louis A. Beecherl, Jr.
3801 Beverly Drive
Dallas, TX 75205

RE: MUR 1837

Dear Mr. Beecherl:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074457 1

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

P 290 407 445 572

MUR 1837 REILLY

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
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☑ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Louis A. Beecher, Jr.
3801 Beverly Drive
Dallas, Tx 75205

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943114

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-8

POSTMARK
RECEIVED NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)
3801 Beverly

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. D. Phil Bolin
510 Hamilton Building
Wichita Falls, TX 76301

RE: MUR 1837

Dear Mr. Bolin:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074457 3

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 REILLY

PS Form 3811, Dec. 1980

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(CONSULT POSTMASTER FOR FEES)

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☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. D. Phil Boun
510 Hamilton Building
Wichita, Falls, TX 76301

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943163

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-16-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
510 Hamilton Bldg.
W. F., Tex. 76301

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1184

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. D.E. Brand
P.O. Box 1840
McAllen, TX 78501

RE: MUR 1837

Dear Mr. Brand:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074457 5

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900074457 6

MUR 1837 REILLY

PS Form 3811, Dec. 1980

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Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. O. E. Brand
P. O. Box 1840
McAllen, Tx 78501

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943113

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

McALLEN TX NOV 8 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS 12

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. L.D. Brinkman
2123 Sidney Baker Street
Kerrville, TX 78028

RE: MUR 1837

Dear Mr. Brinkman:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074457 7

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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(CONSULT POSTMASTER FOR FEES)

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☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. L. D. Brinkman
2123 Sidney Baker Street
Kerrville, Tx 78028

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943112

(Always obtain signature of addressee or agent)

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

5. Rae Baldwin
DATE OF DELIVERY
11-8-84

POSTMARK
KERRVILLE TX
NOV 8 1984

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. B.G. Brookshire
P.O. Box 1411
Tyler, TX 75701

RE: MUR 1837

Dear Mr. Brookshire:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074579

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

R 9004074580

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. G. G. Brookshire
P.O. Box 1411
TYLER, TX 75701

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943162

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 12 1984

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. William E. Burford
1400 Main Street
Dallas, TX 75202

RE: MUR 1837

Dear Mr. Burford:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074581

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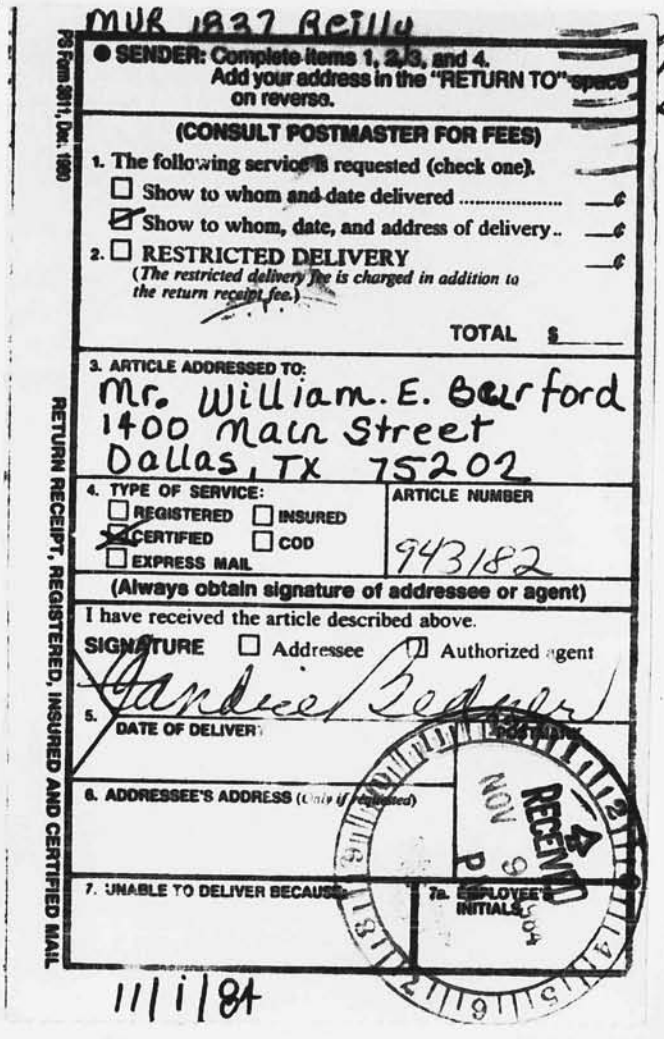
Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☑ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $___

3. ARTICLE ADDRESSED TO:
Mr. William E. Burford
1400 Main Street
Dallas, TX 75202

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943182

(Always obtain signature of addressee or agent)

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

5. Candice Bedner
DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RECEIVED NOV 9 1984

11/1/84

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

8 9 0 4 0 7 4 4 5 8 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Gilbert M. Denman, Jr.
535 San Antonia Bank & Trust
Building
San Antonia, TX 78205

RE: MUR 1837

Dear Mr. Denman:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074458 3

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8 9 0 4 0 7 4 4 5 8 4

PS Form 3811, Dec. 1980

Mut 1837 Reilly

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $_____

3. ARTICLE ADDRESSED TO:
Mr. Gilbert M. Denman, Jr.
535 San Antonio Bank + Trust Building
San Antonio, TX 78205

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943181

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-9-84

POSTMARK

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Donald S. Elliott
P.O. Box 6867
San Antonia, TX 78209

RE: MUR 1837

Dear Mr. Elliott:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074458 5

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

8900744585

MUR 1837 Reilly

PS Form 3811, Dec. 1980

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr Donald S. Elliott
P.O. Box 6867
San Antonio, TX 78209

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

APTICLE NUMBER
943150

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
POSTMARK
NOV 9 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:
7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Paul K. Herder
4202 Hwy. 90 East
San Antonia, TX 78219

RE: MUR 1837

Dear Mr. Herder:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074587

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☑ Show to whom, date, and address of delivery.. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Paul K. Herder
4202 Hwy, 90 East
San Antonio, TX 78219

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943179

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 8 1984

SAN ANTONIO, TX SPECIAL DELIVERY SER.
POSTMARK
NOV 9 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Richard Doornbos
P.O. Bos 696
Lederland, TX 77627

RE: MUR 1837

Dear Mr. Doornbos:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074459

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

Mur 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ___¢
☒ Show to whom, date, and address of delivery .. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $___

3. ARTICLE ADDRESSED TO:
Mr. Richard Doornbos
P.O. Box 696
Hederland, TX 77627

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943178

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-14-84

POSTMARK
NEDERLAND NOV 14 1984 TX

6. ADDRESSEE'S ADDRESS (*Only if requested*)
Box 696
Nederland TX 77627

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS
PRS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Harvey Huie
14400 Dallas Parkway
P.O. Box 402331
Dallas, TX 75240

RE: MUR 1837

Dear Mr. Huie:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074459 1

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If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 REILLY

PS Form 3811, Dec. 1980 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Harvey Huie
14400 Dallas Parkway
P.O. Box 402331
Dallas, TX 75240

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943177

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:
7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. James C. Holcomb
2201 Teckla
Amarillo, TX 79106

RE: MUR 1837

Dear Mr. Holcomb:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074459 3

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074459 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Frank P. Horlock, Jr.
P.O. Box 52608
Houston, TX 77052

RE: MUR 1837

Dear Mr. Horlock:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074459 3

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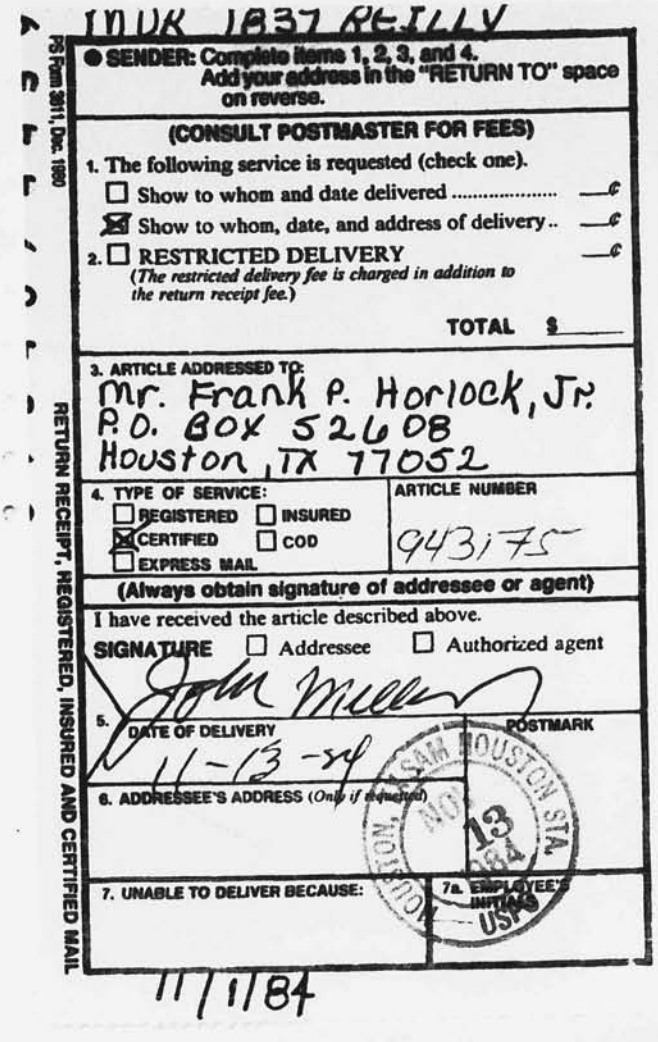
Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel



INUK 1837 REILLY

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ¢
☒ Show to whom, date, and address of delivery.. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Frank P. Horlock, Jr.
P.O. Box 52608
Houston, TX 77052

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943175

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-13-84

POSTMARK
HOUSTON SAM HOUSTON STA. NOV 13 1984 TEXAS

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS
USPS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Michael D. Hutchison
5949 Sherry Lane, Suite 700
Dallas, TX 75225

RE: MUR 1837

Dear Mr. Hutchison:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074459 7

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 REILLY

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Michael D. Hutchison
5949 Sherry Lane, Suite 700
Dallas, TX 75225

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943174

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY J. DeLapp

POSTMARK
DALLAS, TX PRESTON STA USPO NOV 13 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Thomas T. Keeler
P.O. Box 7535
Corpus Christi, TX 78415

RE: MUR 1837

Dear Mr. Keeler:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

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8904074459

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

9904074466 00

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Frances W. Klein
1702 N. Julian
Amarillo, TX 79102

RE: MUR 1837

Dear Ms. Klein:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074601

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

P 890 407 446

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

- (CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☑ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Frances W. Klein
1702 N. Julian
Amarillo, TX 79102

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943172

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11/3/84

POSTMARK
AMARILLO, TX
NOV 7 9

6. ADDRESSEE'S ADDRESS (Only if requested)
1702 N. Julian

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Joan Kunitz
P.O. Box 1053
Sinton, TX 78387

RE: MUR 1837

Dear Ms. Kunitz:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

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8904074460 3

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Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
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(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
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☒ Show to whom, date, and address of delivery.. ___¢
2. ☐ RESTRICTED DELIVERY ___¢
(*The restricted delivery fee is charged in addition to the return receipt fee.*)

TOTAL $____

3. ARTICLE ADDRESSED TO:
Mrs. Joan Kunitz
P.O. Box 1053
Sinton, TX 78387

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943171

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
NOV 9 1984

POSTMARK
SINTON, TEXAS NOV 9 1984 USPO.

6. ADDRESSEE'S ADDRESS (*Only if requested*)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS
AEN

11/1/84

8 9 0 4 0 7 4 4 6 0 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mrs. Ella M. Kellum
2114 Sunnyvale
Grand Prairie, TX 35475

RE: MUR 1837

Dear Ms. Kellum:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074460 5

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

MUR 1837 Reilly

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☒ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)
TOTAL $

3. ARTICLE ADDRESSED TO:
Mrs. Ella H. Kellum
2114 Sunnyvale
Grand Prairie, Tx 35475

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943170

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:
7a. EMPLOYEE'S INITIALS

PS Form 3811, Dec. 1980
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P 890 400 744

11/11/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Joe B. Kercheville
100 NBC Bldg.
San Antonia, TX 78205

RE: MUR 1837

Dear Mr. Kercheville:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

R 9004074467

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
Associate General Counsel

9904074328

MUR 1837 Kelly

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .. ¢
2. ☐ RESTRICTED DELIVERY ¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $

3. ARTICLE ADDRESSED TO:
Mr. Joe B. Kercheville
100 NBC Bldg.
San Antonio, Tx 78205

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943169

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
11-20-84

POSTMARK
SAN ANTONIO, TX
NOV 20 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

11/1/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ANNEX B TO THE PUBLIC RECORD FILE IN MUR 1837

(SEE NOTE AT FIRST PAGE OF THE MICROFILM FILE)

B

8904007446609

RECEIVED AT THE FEC
GCC#5884
84 DEC 6 P1:00

LAW OFFICES OF
TOBOLOWSKY, PRAGER & SCHLINGER
A PROFESSIONAL CORPORATION
1900 SOUTHLAND CENTER
400 NORTH OLIVE, LB 258
DALLAS, TEXAS 75201
(214) 742-9205

EDWIN TOBOLOWSKY
HENRY D. SCHLINGER
JEROME L. PRAGER
STANLEY C. SIMON
RONALD L. McKINNEY
N. HENRY SIMPSON, III
ROBERT A. MILLER
PETER M. GROSS
EMILY G. TOBOLOWSKY
PATRICIA P. REESER
STUART A. LAUTIN

J. MANUEL HOPPENSTEIN
(1910-1983)

JACK L. STUART
OF COUNSEL

November 28, 1984

CERTIFIED MAIL, RRR # P 726 787 926

ATTN: Patty Reilly, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1837

Dear Ms. Reilly:

This office represents John Randolph Sauer in the above-entitled matter. Our client is forwarding to you, under separate cover, a completed Statement and Designation of Counsel form.

For your record, please enter this letter as ouf Firm's appearance on behalf of Mr. Sauer and, further, as his denial of any violation or wrong-doing as alleged in the Complaint in this matter.

Very truly yours,

Henry Simpson

NHS:lk
cc: Mr. John Randolph Sauer

84 DEC 6 P2:04

8904074610

RECEIVED BY THE FEC
LGC # 594
84 DEC 12 P12:27

ROBERT P. GRIFFIN *
CLEVELAND THURBER
JAMES F. SCHOENER *
WILLIAM G. BUTLER
FITCH R. WILLIAMS
MICHAEL J. HODGE
COUNSEL

EMMETT E. EAGAN
CONSULTING PARTNER

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
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GILBERT E. GOVE
WOLFGANG HOPPE
GEORGF F. DeCLAIRE *
ROBERT S. KETCHUM, P.C.
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ROCQUE E. LIPFORD, P.C.

JOEL L. PIELL
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W. MACK FAISON
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DONNA J. DONATI
DONALD W. KEIM

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BIRMINGHAM, MICHIGAN
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TRAVERSE CITY, MICHIGAN

LARRY J. SAYLOR *
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RICHARD J. SERYAK
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MAUREEN P. AUGHTON
LELAND D. BARRINGER *
TIMOTHY D. SOCHOCKI
THOMAS C. PHILLIPS
HUGH M. SMITH
MARJORY G. BASILE
TERRENCE M. CRAWFORD
RYAN H. HAYWOOD
GEORGE G. MARTIN
CHARLES M. McCUEN *
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J. KEVIN TRIMMER
STEVEN D. WEYHING
BRANT A. FREER
JOHN D. STOUT

RICHARD A. GAFFIN
AMANDA VAN DUSEN
BRIAN A. KASER
GARY A. BRUDER
SALLY L. GEIB
KAY I. JOHNSON
E. ELIZABETH PERLMAN
J. SCOTT TIMMER
CHARLES L. SWEERIS
BEVERLY HALL BURNS
JOHN D. RAYIS
STEPHEN J. OTT
LINDA O. GOLDBERG
THOMAS G. APPLEMAN
KAREN A. PULLIAM
NANETTE RUTKA
HAROLD W. BULGER, JR
GREGORY V. DiCENSO
NANCY KEPPELMAN
CYNTHIA B. FAULHABER

RICK A. PACYNSKI
NOAH YANICH
LISA B. ARCHER
MICHAEL P. COAKLEY
STEFAN B. HERPEL
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PATRICIA T. QUINN
KEVIN L. SMITH
TIMOTHY S. KNOWLTON
JEFFREY M. McHUGH
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THOMAS F. CAVALIER
GERARD McGUIRE
JOHN J. AYAUB
JAMES D. ROBB
CLAUDIA J. ROBERTS
LINDA G. SKLAREN

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
* ALSO ADMITTED IN FLORIDA

December 11, 1984

84 DEC 14 P12:54

Patty Reilly, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

MUR 1837

Dear Ms. Reilly:

Enclosed please find the Designation of Counsel form for the Republican Party of Texas in MUR 1837. My response on behalf of this client will be filed forthwith.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb
Enclosure

8907495111

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

12/11/84
Date

Signature Executive Director

RESPONDENT'S NAME: John Maxwell, Executive Director

ADDRESS: Republican Party of Texas
1300 Guadalupe, Suite 205
Austin, TX 78701

HOME PHONE:

BUSINESS PHONE:

8904074461 2

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC#5896
84 DEC 7 A8:50

MUR 1837

NAME OF COUNSEL: Henry Simpson

ADDRESS: Tobolowsky Prager & Schlinger
1900 Southland Center
Dallas, TX 75201

TELEPHONE: (214)-742-9205

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
84 DEC 7 A10:45

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Date

Signature

RESPONDENT'S NAME: John Randolph Sauer

ADDRESS: P.O. Box 470063
Dallas, Texas 75220

HOME PHONE: 214-357-2205

BUSINESS PHONE: (214)-637-3716

8204074461 3

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84 DEC 18 A8:33

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

ROBERT P. GRIFFIN *
CLEVELAND THURBER
JAMES F. SCHOENER *
WILLIAM G. BUTLER
FITCH R. WILLIAMS
MICHAEL J. HODGE
COUNSEL

EMMETT E. EAGAN
CONSULTING PARTNER

SIDNEY T. MILLER (1864-1940)
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LEWIS H. PADDOCK (1866-1935)
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NANCY KEPPELMAN
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RICK A. PACYNSKI
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KIRK D. MESSMER
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KAREN A. McCOY
THOMAS F. CAVALIER
GERARD McGUIRE
JOHN J. AYAUB
JAMES D. ROBB
CLAUDIA J. ROBERTS
LINDA G. SKLAREN

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
* ALSO ADMITTED IN FLORIDA

84 DEC 18 A9:49

December 17, 1984

Patty Reilly, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1837
Abe M. Katz

Dear Ms. Reilly:

Enclosed please find the Designation of Counsel form for Abe M. Katz of Corpus Christi, Texas. Please add his name as a respondent and adopt the general response of individual respondents on his behalf.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb
Enclosure

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th St. N.W. Suite 1200
Washington, D.C. 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

12/14/84
Date

Abe M. Katz
Signature

RESPONDENT'S NAME: Abe M. Katz

ADDRESS: P.O. Box 1438
Corpus Christi, Tx. 78403

HOME PHONE: 512-852-4524

BUSINESS PHONE: 512-882-4371

8204074461

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

RECEIVED AT THE FEC
GCC#5938
84 DEC 12 A8:56

JAMES F. SCHOENER
(202) 789-8643

December 10, 1984

Patty Reilly, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

MUR 1837

84 DEC 12 A9:46

Dear Ms. Reilly:

Enclosed please find Designation of Counsel forms by Bruce Calder of Dallas, Texas and Mr and Mrs. Vance Miller of Dallas, Texas, in the above-entitled matter. In addition, I am informed that Arthur Cary of Dallas, Texas; Raymond Tapp of Lubbock, Texas; Wendell Hobbs of McAllen, Texas have indicated that they would desire our firm to represent them. Since I have not received a Designation of Counsel from any of them, would you be so kind as to check these last three names to determine if they have sent such Designations directly to you.

The Republican Party of Texas has informed me that they believe they sent their Designation of Counsel form directly to your office; if so, would you please confirm its arrival as well.

As I stated in our telephone conversation of this afternoon, I would like to have a conference Friday morning with you in presenting our response; we will have our accountants from Texas available at that time. I believe such a conference could be beneficial to both sides to clear up misunderstanding and confusion.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb
Enclosures

8904074616

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: MILLER, CANFIELD, PADDOCK AND STONE

ADDRESS: SUITE 1200
1015 FIFTEENTH ST. N.W.
WASHINGTON, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

12-5-84
Date

Bruce Calder
Signature

RESPONDENT'S NAME: BRUCE CALDER

ADDRESS: 1200 HARTFORD BLDG.
DALLAS, TX 75201

HOME PHONE: 214-528-1758

BUSINESS PHONE: 214-754-8008

8204074467

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Mrs. Vance C. Miller

November 30, 1984
Date

Signature

RESPONDENT'S NAME: Mr. Vance C. Miller, Mrs. Vance C. Miller

ADDRESS: 2001 Bryan Tower, 30th Floor
Dallas, TX 775201

HOME PHONE: (214) 522-1610

BUSINESS PHONE: (214) 748-9171

8904074461 8

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LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

84 DEC 6 AM : 34

December 5, 1984

JAMES F. SCHOENER
(202) 789-8643

Ms. Patty Reilly
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR 1837

Dear Ms. Reilly:

Enclosed please find additional signed Designation of Counsel forms designating our firm as counsel on behalf of the following unnamed respondents in the above-entitled MUR:

D. Phil Bolin	Witchita Falls, TX
James C. Holcomb	Amarillo, TX
Mrs. Ella M. Kellum	Grand Prairie, TX
James E. Kellum	Grand Prairie, TX
Frances W. Klein	Amarillo, TX
Gladys Kimberly Klein	Amarillo, TX
Dr. S. J. Rogers	Beaumont, TX

Please grant an extension of time for response for each of these respondents. I also ask that the general responses heretofore entered on behalf of my other clients apply to these additional respondents.

In addition, I am informed and believe that the Texas Republican Party has sent a Designation of Counsel form that has still not reached my office. I ask a similar continuance on their behalf.

Finally, please find enclosed herein a response from Mr. & Mrs. Alkek.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener (cb)
James F. Schoener, Esq.

JFS/cb
Enclosures

9904074461 9

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th St., NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-19-84
Date

Signature

RESPONDENT'S NAME: D. Phil Bolin

ADDRESS: 510 Hamilton Bldg.
Wichita Falls, Tx. 76301

HOME PHONE: (817) 767-5654

BUSINESS PHONE: (817) 723-7322

8904074462O

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: James F. Scheener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th St., NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-30-84
Date

James C. Holcomb
Signature

RESPONDENT'S NAME: James C. Holcomb

ADDRESS: 2201 Tackle
Amarillo, Texas 79106

HOME PHONE: 806/355-7625

BUSINESS PHONE: 806/353-9431

8 9 0 4 0 7 4 4 6 2 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: (202)789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 19, 1984
Date

Ella M. Kellum
Signature

RESPONDENT'S NAME: Mrs. Ella M. Kellum

ADDRESS: 2114 Sunnyvale
Grand Prairie, Texas 75050

HOME PHONE: (214)641-1505

BUSINESS PHONE: (817)640-1550

8904007446822

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: (202)789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 14, 1984
Date

Signature

RESPONDENT'S NAME: James E. Kellum

ADDRESS: 2114 Sunnyvale
Grand Prairie TX 75050

HOME PHONE: (214)641-1505

BUSINESS PHONE: (817)640-1550

8904074462 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Mr. James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 14, 1984
Date

Frances W. Klein
Signature

RESPONDENT'S NAME: Frances W. Klein

ADDRESS: Suite 207-Coble Bldg.
620 So. Taylor St.
Amarillo, Texas 79101

HOME PHONE: 806-372-4900

BUSINESS PHONE: 806-372-7681

8907446624

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Mr. James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 17, 1984
Date

J. Kimberley Klein
Signature

RESPONDENT'S NAME: Gladys Kimberley Klein (College Student)

ADDRESS: Suite 207-Coble Bldg.
620 So. Taylor St.
Amarillo, Texas 79101

HOME PHONE: 303-796-9563

BUSINESS PHONE: 806-372-7681

8904074462 5

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esquire

ADDRESS: Miller, Canfield, Paddock and Stone

1015 15th Street, N.W., Suite 1200

Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov. 29, 1984
Date

Dr. S. J. Rogers
Signature

RESPONDENT'S NAME: Dr. S. J. Rogers

ADDRESS: Rogers Bros. Investments
P. O. Box 1310

Beaumont, TX 77704

HOME PHONE: 409/835-0918

BUSINESS PHONE: 409/838-6681

8904074462 6

3011 North Main Street
Victoria, Texas 77901
November 29, 1984

James F. Schoener, Esq.
Miller, Canfield, Paddock & Stone
1015 15th Street NW, Suite 1200
Washington, DC 20005

Dear Mr. Schoener:

In reference to your letter dated November 9, 1984, this is to advise that neither Mr. Alkek nor I have received any correspondence from the Federal Election Commission. Of course, if either or both of us should become involved, we would like to have you represent us.

Please keep me informed of your progress. I would appreciate having any future correspondence directed to me at 1300 Main Street, Suite 501, Houston, Texas 77002. I may be reached by telephone at (713) 658-8780.

Please acknowledge receipt of this letter by signing one copy and returning it to me in the enclosed, self-addressed envelope.

Yours very truly,

Margaret Alkek

(Mrs.) Margaret Alkek

RECEIVED THIS 5th DAY
OF Dec., 1984.

/s/ James F. Schoener

8904074462 7

RECEIVED
FEC
85 JAN 16 P12:28

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005
TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

MUR 1837
Reilly

JAMES F. SCHOENER
(202) 789-8643

January 14, 1985

Ms. Patty Reilly
Office of the General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

85 JAN 16 P2:34

RE: MUR 1837

Dear Ms. Reilly:

Enclosed please find the Designation of Counsel form for Mrs. Mildred W. Simmons. As you can see, Mrs. Simmons was confused as to how to complete the form and she neglected to sign it. She did date the form and add her telephone number.

I ask that the response heretofore made on behalf of the individual respondents be amended to include Mrs. Simmons.

Thank you.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By: James F. Schoener
James F. Schoener
Of Counsel

JFS/cb
Enclosure

8904074628

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

1-8-1985
Date

Signature

RESPONDENT'S NAME: Mrs. Mildred W Simmons

ADDRESS: PO Box 186

Imperial , TX 79743

HOME PHONE: 536-2359

BUSINESS PHONE: none

8900074462 9

RECEIVED AT THE FEC
GCC#5505
84 NOV 5 All : 58

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov. , 1984
Date

Signature

RESPONDENT'S NAME: John Baxter
Treasurer of Friends of Phil Gramm

ADDRESS: 2355 Stemmons Freeway, Suite 503
Dallas, TX 75207

HOME PHONE: 214/528-5020

BUSINESS PHONE: 214/638-9533

84 NOV 5 P1:29

8900074463O

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC
GCC #5537
84 NOV 30 P2:40

MUR _____

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

84 NOV 30 P4:04

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

Paul K. Herder
Signature

RESPONDENT'S NAME: Paul K. Herder

ADDRESS: 4202 Hwy. 90 E.
San Antonio, Texas 78219

HOME PHONE: 512-824-5926

BUSINESS PHONE: 512-337-6653

2904074463 1

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC
MCC#5815
84 NOV 29 A 9:06

MUR _____

NAME OF COUNSEL: Miller, Canfield, Paddock & Stone

ADDRESS: Suite 1200
1015 F. Fteenth Street, N.W.
Washington D.C. 20005

TELEPHONE: (202) 789-8640

84 NOV 29 A 9:58

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/23/84
Date

Tom Shelton
Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

_____

_____

HOME PHONE: _____

BUSINESS PHONE: _____

8904074463 2

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1862-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

GLC #5835
84 NOV 30 A 9:36

November 30, 1984

JAMES F. SCHOENER
(202) 789-8643

Patty Reilly, Esquire
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

HAND DELIVERED

Re: MUR 1837

Dear Ms. Reilly:

Enclosed please find additional signed Designation of Counsel forms designating our firm as counsel on behalf of the following unnamed respondents in the above-entitled MUR:

Lester L. Logue	Dallas, TX
Edward P. Rea	Plano, TX
Elga Rea	Plano, TX
Mrs. Merle Stieler	Comfort, TX
Peter Gill	San Antonio, TX
Mrs. H. B. Zachry, Jr.	San Antonio, TX
R. J. Schumacher	Fort Worth, TX
Roslyn Canavan	San Antonio, TX
Gene F. Canavan	San Antonio, TX
Robert S. Folsom	Dallas, TX
Margaret Folsom	Dallas, TX
H. G. Schiff	Dallas, TX
Joe B. Kercheville	Boerne, TX
Glen E. Roney	McAllen, TX

I have further received information from Albert Alkek of Victoria, Texas that he never received an FEC complaint, but, if he is a respondent, he will designate us as counsel. Please advise if you do include him, or whether he was excluded for some reason.

I request that previous requests made by me as counsel on behalf of other individual respondents in this case, apply to these additional clients as well.

Very truly yours,

MILLER CANFIELD PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb
Enclosures

8 9 0 4 0 7 4 4 6 3 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James E. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-20-84
Date

Signature

RESPONDENT'S NAME: Lester L. Logue

ADDRESS: 1300 One Energy Square
Dallas, Texas 75206

HOME PHONE: (214) 369-1266

BUSINESS PHONE: (214) 368-4657

8907446434

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-20-84
Date

Edward P. Rea
Signature

RESPONDENT'S NAME: Edward P. Rea

ADDRESS: 5305 Mariners Dr.
Plano, Tx. 75075

HOME PHONE: 214-596-8254

BUSINESS PHONE: 214-934-1234

8904074463 5

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 2005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-20-84
Date

Signature

RESPONDENT'S NAME: Elga Rea

ADDRESS: 5305 Mariners Dr.
Plano, Tx. 75075

HOME PHONE: 214-596-8254

BUSINESS PHONE: 214-934-1234

8904074636

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq. Miller, Canfield Paddock & Stone

ADDRESS: 1015-15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-14-84
Date

Mrs. Merle Stieler
Signature

RESPONDENT'S NAME: Mrs. Merle Stieler

ADDRESS: Box 308
Comfort, Texas 78013
512-995-2367

HOME PHONE: same

BUSINESS PHONE:

8904074637

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James T. Scherer

ADDRESS: 1015 15th St. N.W. #1200
Washington, D.C. 20005

TELEPHONE:

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/15/81
Date

Peter Gill
Signature

RESPONDENT'S NAME: Peter Gill

ADDRESS: 615 Soledad St.
San Antonio, Texas 78292

HOME PHONE:

BUSINESS PHONE:

8904074463 8

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 21, 1984
Date

Mrs H B Zachry Jr
Signature

RESPONDENT'S NAME: Mrs. H. B. Zachry, Jr.

ADDRESS: 7603 Shady Lane
San Antonio, TX 78209

HOME PHONE: (512) 826-4602

BUSINESS PHONE: N/A

8904074463 9

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: 1015 15th St. NW.
Suite 1200
Washington DC 20005

TELEPHONE: 789 8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 21, 1984
Date

Signature R. J. Schumacher

RESPONDENT'S NAME: R.J. Schumacher

ADDRESS: 3402 Texas American Bank Bldg
Fort Worth, Texas 76102

HOME PHONE:

BUSINESS PHONE:

8907446440

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 21 1984
Date

Roslyn Canavan
Signature

RESPONDENT'S NAME: Roslyn Canavan

ADDRESS: P. O. Box 16007
San Antonio, TX 78216

HOME PHONE:

BUSINESS PHONE:

2004074641

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 21, 1984
Date

Signature

RESPONDENT'S NAME: Gene F. Canavan

ADDRESS: P. O. Box 16007

San Antonio, TX 78216

HOME PHONE:

BUSINESS PHONE:

9004074456442

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-22-84
Date

Robert S. Folsom
Signature

RESPONDENT'S NAME: Robert S. Folsom

ADDRESS: 16475 Dallas Parkway, Suite 800
Dallas, Texas 75248

HOME PHONE: 214 - 931-7400

BUSINESS PHONE: 214 931-7400

8904074464643

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F Schoener, Esq.

ADDRESS: Miller, Canfield Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 22, 1984
Date

Mrs Margaret D Folsom
Signature

RESPONDENT'S NAME: MARGARET FOLSOM

ADDRESS: 16475 Dallas Parkway, Suite 800
Dallas, Texas 75248

HOME PHONE: 214 - 931-7400

BUSINESS PHONE: 214 - 931-7400

8907447644

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Streeet, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 26, 1984
Date

Signature

RESPONDENT'S NAME: H. G. Schiff

ADDRESS: 5307 E. Mockingbird, Suite 1001
Dallas, TX 75206

HOME PHONE: 214/361-1538

BUSINESS PHONE: 214/826-3460

8004074446

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/25/84
Date

Joe B. Kercheville
Signature

RESPONDENT'S NAME: Joe B. Kercheville

ADDRESS: Rt. 3, Box 3352
Boerne, Tx 78006

HOME PHONE: 512-698-1003

BUSINESS PHONE: 512-694-4098

2004074446

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 26, 1984
Date

Glen E. Roney
Signature

RESPONDENT'S NAME: Glen E. Roney

ADDRESS: P. O. Box 1300, (3316 Kent Lane)
McAllen, TX 78501

HOME PHONE: 512 682-1361

BUSINESS PHONE: 512 686-1733

8900749647

MUR 1837
Reilly

PHIL GRAMM
U.S. SENATE TEXAS

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
'84 OCT 31 A10:29

October 30, 1984

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

To Whom It May Concern:

This will certify that the firm of Miller, Canfield, Paddock & Stone is my authorized counsel to represent my campaign committee, Friends of Phil Gramm, in any or all matters before the Commission until further notification from me.

Phil Gramm

PHIL GRAMM

PG:bg

8900744548

Paid for by Friends of Phil Gramm.

GCC#5797
RECEIVED BY THE FEC
HAND DELIVERED
84 NOV 26 P2:09

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

November 26, 1984

JAMES F. SCHOENER
(202) 789-8643

Patty Reilly, Esquire
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

HAND DELIVERED

84 NOV 27 A9:22

Re: MUR 1837

Dear Ms. Reilly:

Enclosed please find additional signed Designation of Counsel forms designating our firm as counsel on behalf of the following unnamed respondents in the above-entitled MUR:

Marvin Selig	Sequin, TX
B. S. Baker	Houston, TX
Mrs. Drayton McLane, Jr.	Temple, TX
Gilbert M. Denman, Jr.	San Antonio, TX
Daniel T. Parker	Houston, TX
William David Lacy	Waco, TX
T. L. Roach, Jr.	Amarillo, TX
Ebby Halliday Acers	Dallas, TX
Thomas E. Hartin	Dallas, TX
S. S. Seltzer, Jr.	Corpus Christi, TX
L. D. Brinkman	Kerrville, TX
Mrs. L. D. Brinkman	Kerrville, TX
Sally S. Emde	Houston, TX
William O. Emde	Houston, TX
M/M Carl E. Oates	Dallas, TX

3 9 0 4 0 7 4 4 6 4 9

Additional respondents have contacted my office by telephone, and I anticipate more designations in the next few days.

Very truly yours,

MILLER CANFIELD PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb
Enclosures

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER, ESQ.

ADDRESS: MILLER, CANFIELD, PADDOCK AND STONE
1015 15TH STREET, N.W., SUITE 1200
WASHINGTON, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 16, 1984
Date

X MARVIN SELIG
Signature

RESPONDENT'S NAME: MARVIN SELIG

ADDRESS: P.O. Box 911
Seguin, Texas 78155

HOME PHONE: (512) 379-3640

BUSINESS PHONE: (512) 379-7520

8904074650

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-14-84
Date

Signature
Mr. B. S. BAKER

RESPONDENT'S NAME: B.S. BAKER

ADDRESS: 8636 Lafonte
Houston, tx 77024

HOME PHONE:

BUSINESS PHONE: (713) 229-2800

8204074465

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Miller, Canfield, Paddock and Stone

ADDRESS: Suite 1200
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-20-84
Date

Mrs. Drayton McLane, Jr.
Signature

RESPONDENT'S NAME: Mrs. Drayton McLane, Jr.

ADDRESS: 1106 Dakota
Temple, TX 76501

HOME PHONE: 817/778-3955

BUSINESS PHONE: 817/778-7500

8904074465 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener
Miller, Canfield, Paddock and Stone

ADDRESS: 1015 15th Street, NW, Suite 1200
Washington, D. C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov. 16, 1984
Date

Gilbert M Denman
Signature
Gilbert M. Denman, Jr.

RESPONDENT'S NAME: Gilbert M. Denman, Jr.

ADDRESS: Suite 535, 711 Navarro Street
San Antonio, Tx. 78205

HOME PHONE: 512/342-5302

BUSINESS PHONE: 512/224-1011

9004074465 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esquire

ADDRESS: Miller, Canfield, Paddock and Stone

1015 15th Street, NW, Suite 1200

Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/20/84
Date

Daniel T. Parker
Signature

RESPONDENT'S NAME: DANIEL T. PARKER

ADDRESS: 259 PLANTATION

HOUSTON, TEXAS 77024

HOME PHONE: 713 468-4558

BUSINESS PHONE: 713 926-4461

8904074454

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER, ESQ.

ADDRESS: MILLER, CANFIELD, PADDOCK & STONE
1015 15th Street, NW, Suite 1200
Washington D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/16/84
Date

Signature

RESPONDENT'S NAME: William David Lacy

ADDRESS: 3210 Wooded Acres
Waco Tx 76710

HOME PHONE: 753-3811

BUSINESS PHONE: 753-6461

9004074465

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/19/84
Date

T. L. Roach Jr.
Signature T.L. Roach, Jr.

RESPONDENT'S NAME: T.L. Roach, Jr.

ADDRESS: P.O. Box 1871
Amarillo, Texas 79105

HOME PHONE: 806-373-5081

BUSINESS PHONE: 806-376-4371

8904074465 6

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-15-84
Date

Ebby Halliday Acers
Signature
Ebby Halliday Acers

RESPONDENT'S NAME: Ebby Halliday Acers

ADDRESS: P. O. Box 12348
Dallas, Texas 75225

HOME PHONE: (214) 368-1866

BUSINESS PHONE: (214) 980-6666

8904074457

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-20-1984
Date

Signature

RESPONDENT'S NAME: Thomas F Hartin

ADDRESS: 5905 Club Oaks Dr.
Dallas, Texas 75248

HOME PHONE: 214/931-5591

BUSINESS PHONE: 214/392-4411

8904074465 8

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/19/84
Date

S S Seltzer Jr
Signature

RESPONDENT'S NAME: S. S. Seltzer, Jr.

ADDRESS: 4025 Ocean Drive
P. O. Box 6382
Corpus Christi, Texas 78411

HOME PHONE: (512) 855-1717

BUSINESS PHONE: (512) 887-2040

8904074465 9

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1937

NAME OF COUNSEL: JAMES F. SCHOENER, ESQ.

ADDRESS: MILLER, CANFIELD, PADDOCK + STONE.
1015 15th STREET, NW, SUITE 1200
WASHINGTON, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

L.D. Brinkman
Signature
L.D. BRINKMAN

RESPONDENT'S NAME: L.D. BRINKMAN

ADDRESS: P.O. BOX 1522
KERRVILLE, TX 78028

HOME PHONE:

BUSINESS PHONE: (512) 896-5111

8907446660

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER, ESQ.

ADDRESS: MILLER, CANFIELD, PADDOCK & STONE
1015 15th Street, NW, SUITE 1200
WASHINGTON, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

X Mrs. L.D. Brinkman
Signature
MRS. L.D. BRINKMAN

RESPONDENT'S NAME: MRS. L.D. BRINKMAN

ADDRESS: P.O. BOX 1522
KERRVILLE, TX 78028

HOME PHONE:

BUSINESS PHONE: (512) 896-5111

8004074466 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq., Miller, Canfield, Paddock & Stone

ADDRESS: 1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/19/84
Date

Sally S. Emde
Signature

RESPONDENT'S NAME: Sally S. Emde

ADDRESS: 9507 Harwin Dr.
Houston, Texas 77036

HOME PHONE: 713/963-0007

BUSINESS PHONE: 713/785-5000

8204074466 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq., Miller, Canfield Paddock & Stone

ADDRESS: 1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/19/84
Date

William O. Emde
Signature

RESPONDENT'S NAME: William O. Emde

ADDRESS: 9507 Harwin Dr.
Houston, Texas 77036

HOME PHONE: 713/963-0007

BUSINESS PHONE: 713/785-5000

8904074466 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
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Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/15/84
Date

Mrs. Carl E. Oates
Signature

RESPONDENT'S NAME: Carl E. Oates
Mrs. Carl E. Oates

ADDRESS: 6924 Stefani Drive
Dallas, Texas 75225

HOME PHONE: 214/363-7771

BUSINESS PHONE: 214/655-2734

8204074466 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 21, 1984
Date

Mrs H B Zachry Jr
Signature

RESPONDENT'S NAME: Mrs. H. B. Zachry, Jr.

ADDRESS: 7603 Shady Lane
San Antonio, TX 78209

HOME PHONE: (512) 826-4602

BUSINESS PHONE: N/A

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LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

November 20, 1984

JAMES F. SCHOENER
(202) 789-8643

Patty Reilly, Esquire
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

HAND DELIVERED

84 NOV 21 P12:42

Re: MUR 1837

Dear Ms. Reilly:

Enclosed please find additional signed Designation of Counsel forms designating our firm as counsel on behalf of the following unnamed respondents in the above-entitled MUR:

Mrs. Edith Jones O'Donnell	Dallas, TX
Douglas M. Conlee	Waco, TX
Sam Buchanan	Texarkana, AK
Wilton H. Fair	Tyler, TX
William H. Martin	Midland, TX
Karen V. Martin	Midland, TX
Robert L. Wheelock, Jr.	Corsicana, TX
Bruce G. Brookshire	Tyler, TX
Harold D. Courson	Perryton, TX
Lt. Gen. Sam Maddux, Jr.	San Antonio, TX
Robert E. Windom, M.D.	Sarasota, FL
Lelia H. Windom	Sarasota, FL
William L. Anderson	Addison, TX
Ray L. Hunt	Dallas, TX
Mrs. H. L. Hunt	Dallas, TX
Mrs. Nancy Hunt	Dallas, TX
David M. Crowley	Dallas, TX 75229
Mrs. Chester R. Upham, Jr.	Mineral Wells, TX
M/M Frank W. Mayborn	Temple, TX
Catharine W. McAnally	Amarillo, TX 79105
Mr. David R. Tacke	Dallas, TX
Mrs. David Tacke	Dallas, TX
John W. Dixon	Dallas, TX
Ernest Fay	Houston, TX
Joel W. Daniel	Waco, TX
Harvey Huie	Dallas, TX
Richard E. Doornbos	Nederland, TX
Wayne E. Thomas	Hereford, TX 79045
Mrs. Bettye Nowlin	Ft. Worth, TX
R. L. Foree	Dallas, TX

8 3 0 1 4 0 7 4 4 6 6 6

Additional respondents have contacted my office by telephone, and I anticipate more designations in the next few days.

Very truly yours,

MILLER CANFIELD PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb
Enclosures

8904074467

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone

1015 15th Street N. W., Suite 1200

Washington, D. C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov. 14, 1984
Date

Edith Jones O'Donnell
Signature

RESPONDENT'S NAME: Mrs. Edith Jones O'Donnell

ADDRESS: 4929 Seneca Drive

Dallas, Texas 75209

HOME PHONE: 214/350-6543

BUSINESS PHONE: 214/742-7211

2904076468

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/19/94
Date

Douglas M Conlee
Signature

RESPONDENT'S NAME: Douglas M. Conlee

ADDRESS: P.O. Box 7247
Waco, Texas 76714-7247

HOME PHONE: 817-772-2373

BUSINESS PHONE: 817-772-5680

8904074469

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, N.W., Suite 1200
Washington, D. C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

Sam Buchanan
Signature

RESPONDENT'S NAME: Sam Buchanan

ADDRESS: 45 GLOBE Ave
P. O. Box 89
Texarkana, Arkansas 75504

HOME PHONE: (501) 774-3993

BUSINESS PHONE: (501) 773-3827

8 9 0 4 0 0 7 4 4 6 7 0

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER, ESQ.

ADDRESS: MILLER, CANFIELD, PADDOCK & STONE
1015 15th ST., N.W. SUITE 1200
WASHINGTON, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12/84
Date

Wilton H. Fair
Signature

RESPONDENT'S NAME: WILTON H. FAIR

ADDRESS: P.O. BOX 689
TYLER, TX. 75710

HOME PHONE: 214/561-3245

BUSINESS PHONE: 214/592-3811 EXT. 23

2904074467 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Miller, Canfield Paddock and Stone
ATT: James F. Schoener, Esq.

ADDRESS: 1015 15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

William H. Martin
William H. Martin
Signature

RESPONDENT'S NAME: William H. Martin

ADDRESS: 1804 First Nat'l Bank Bldg.
Midland, Texas 79701

HOME PHONE: 915-682-8122

BUSINESS PHONE: 915-682-5216

2024074467 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Miller, Canfield, Paddock and Stone

ADDRESS: Att: James F. Schoener, Esq.
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

Karen V. Martin
Karen V. Martin
Signature

RESPONDENT'S NAME: Karen V. Martin

ADDRESS: 1404 Country Club Drive
Midland, Texas 79701

HOME PHONE: 915/682-8122

BUSINESS PHONE:

8904074467 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq. of the firm of Miller, Canfield, Paddock & Stone

ADDRESS: Suite 1200
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-13-84
Date

Robt. L. Wheelock, Jr.
Signature

RESPONDENT'S NAME: Robt. L. Wheelock, Jr.

ADDRESS: P.O. Box 1239
Corsicana, Texas 75110

HOME PHONE: (214) 874-6932

BUSINESS PHONE: (214) 874-7451

8904074474

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

Bruce G. Brookshire
Signature

RESPONDENT'S NAME: Bruce G. Brookshire

ADDRESS: c/o Lawrence & Lawrence
Attorneys at Law
215 RepublicBank Tyler
Tyler, Texas 75702

HOME PHONE:

BUSINESS PHONE: 214/597-6301

9904074467 5

STATEMENT OF DESIGNATION OF COUNSEL

Copy

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/14/84
Date

Signature

RESPONDENT'S NAME: Harold D. Courson

ADDRESS: Box 809
Perryton, TX 79070

HOME PHONE: (806) 435-3122

BUSINESS PHONE: (806) 435-2910

rec'd day after sending letter

8204074476

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

Sam Maddux, Jr.
Signature
Lt. Gen. Sam Maddux, Jr. by PLB

RESPONDENT'S NAME: Lt. Gen. Sam Maddux, Jr.

ADDRESS: 500 Alameda Circle
San Antonio, Texas 78212

HOME PHONE: 512/822-5343

BUSINESS PHONE: 512/820-0113

8204074467 7

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: James F. Schoener, Esq.

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1015 15th Street, N.W., Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/5/84
Date

J. Robert Windom
Signature

RESPONDENT'S NAME: Robert E. Windom, M.D.

ADDRESS: 1562 South Drive
Sarasota, Florida 33579

HOME PHONE: 366-1550

BUSINESS PHONE: 366-8330

8904074467 8

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
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TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-15-84
Date

Signature

RESPONDENT'S NAME: Lelia H. Windom

ADDRESS: 1562 South Drive
Sarasota, Florida 33579

HOME PHONE: 366-1550

BUSINESS PHONE: n/a

8904074467 9

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Scheiner

ADDRESS: 1015 15TH ST. NW. #1200
Washington D.C. 20005

TELEPHONE: 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/14/84
Date

William L. Anderson, D.V.M.
Signature

RESPONDENT'S NAME: WILLIAM L. ANDERSON D.V.M.

ADDRESS: P.O. Box 539
Addison Texas, 75001

HOME PHONE:

BUSINESS PHONE:

8904074469 80

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 14, 1984
Date

Signature

RESPONDENT'S NAME: Ray L. Hunt

ADDRESS: 2900 InterFirst One Building
1401 Elm Street
Dallas, Texas 75202

HOME PHONE: --

BUSINESS PHONE: 214-744-7995

9904074468 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 14, 1984
Date

Signature

RESPONDENT'S NAME: Mrs. H. L. Hunt

ADDRESS: 2900 InterFirst One Building
1401 Elm Street
Dallas, Texas 75202

HOME PHONE: --

BUSINESS PHONE: 214-744-7995

8204074468 82

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, N.W., Suite 1200
Washington, D.C. 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 14, 1984
Date

Mrs. Nancy A. Hunt
Signature

b.a.

RESPONDENT'S NAME: Mrs. Nancy A. Hunt

ADDRESS: 2900 InterFirst One Building
1401 Elm Street
Dallas, Texas 75202

HOME PHONE: --

BUSINESS PHONE: 214-744-7995

8204074468 83

STATEMENT OF DESIGNATION OF COUNSEL

MUR -1837-

NAME OF COUNSEL: JAMES F. SCHOENER

ADDRESS: MILLER, CANFIELD, PADDOCK & STONE
1015 15TH ST N.W. SUITE 1200
WASHINGTON D.C. 20005

TELEPHONE: (202) 789-8610

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov 13, 1984
Date

David M. Crowley
Signature

RESPONDENT'S NAME: DAVID M CROWLEY

ADDRESS: 10365 INWOOD ROAD
DALLAS TX 75229

HOME PHONE: 214 361-0677

BUSINESS PHONE: 214 386-1000

8904074468 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-14-84
Date

Mrs. Chester R. Upham, Jr. (Virginia)
Signature

RESPONDENT'S NAME: Mrs. Chester R. Upham, Jr. (Virginia)

ADDRESS: P. O. Box 940
Mineral Wells, Texas 76067

HOME PHONE:

BUSINESS PHONE: 817-325-4491

8204074685

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Mr. James F. Schoener, Esq., Miller, Canfield, Paddock & Stone, 1015 15th Street, NW, Suite 1200, Washington, D. C. 20005,

ADDRESS: and phone: Phone A.C. 202, 789-8640.

AND

(OTHER COUNSEL: Mr. Carl Vogt, Fulbright & Jaworski, 1150 Connecticut Avenue, N. W. Suite 400, Washington, D.C. 20036

TELEPHONE: Phone: 202, 452-6800.

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

Frank W. Mayborn
Signature Frank W. Mayborn

Mrs. Frank W. Mayborn
November 15, 1984. Mrs. Frank W. Mayborn (Sue Mayborn)

RESPONDENT'S NAME: Frank W. Mayborn AND Mrs. Frank W. Mayborn (Sue Mayborn)

ADDRESS: 10 ~~South~~ 3rd Street Temple, Texas, 76501.

HOME PHONE:

BUSINESS PHONE: A.C. 817-778-4444.

8 9 0 4 0 7 4 4 6 8 5

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James E. Schoener, Esq.

ADDRESS: 1015 15th Street, N.W., Suite 1200
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov. 14, 1984
Date

Catharine W. McAnally
Signature

RESPONDENT'S NAME: CATHARINE W. McANALLY

ADDRESS: Office P.O. Box 9595
AMARILLO, TEXAS 79105

HOME PHONE: (806) ~~374-1351~~ 353-4556

BUSINESS PHONE: (806) 374-1351

8204074646987

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone

1015 - 15th Street, NW, Suite 1200

Washington, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

David R. Tacke
Signature

RESPONDENT'S NAME: Mr. David R. Tacke

ADDRESS: 5410 Royal Crest

Dallas, TX 75229

HOME PHONE:

BUSINESS PHONE: (214) 661-1000

8204074468

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 - 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

Mrs. David Tacke
Signature

RESPONDENT'S NAME: Mrs. David Tacke

ADDRESS: 5410 Royal Crest
Dallas, TX 75229

HOME PHONE:

BUSINESS PHONE:

8907447489

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 - 15th Street, NW, Suite 1200
Washington, D C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

John W. Dixon
Signature

RESPONDENT'S NAME: John W. Dixon

ADDRESS: 5065 Lakehill Court
Dallas, TX 75220

HOME PHONE:

BUSINESS PHONE: (214) 661-1000

8204074469O

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: ~~Jim Shaner~~ James F. Schoener

ADDRESS: 1015 15TH ST NW.
SUITE 1200
WASHINGTON, D.C. 20005

TELEPHONE: 202.789.8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11.15.84
Date

Ernest B. Fay
Signature

RESPONDENT'S NAME: ERNEST FAY
2304 1st. CITY NATL. BANK BLDG
HOUSTON, TEXAS 77002

ADDRESS:

HOME PHONE: 713.686.5655

BUSINESS PHONE: 713.652.2120

8 9 0 4 0 7 4 4 6 9 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock, Stone
1015 15th Street, NW Suite 1200
Washington, D.C. 20005

TELEPHONE:

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-13-84
Date

Joel W. Daniel
Signature

RESPONDENT'S NAME: Joel W. Daniel

ADDRESS: Box 130
Ware, Texas 7343

~~HOME PHONE~~:

915-247-4177

BUSINESS PHONE:

2004074692

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-16-84
Date

Harvey Huie
Signature

RESPONDENT'S NAME: Harvey Huie

ADDRESS: P. O. Box 802331
Dallas, Texas 75380-2331

HOME PHONE: (214) 239-1885

BUSINESS PHONE: (214) 980-4170

8204074469 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/14/84
Date

Richard E. Doornbos
Signature

RESPONDENT'S NAME: Richard E. Doornbos

ADDRESS: 3304 Tipps
Nederland, TX

HOME PHONE: 409-727-3063

BUSINESS PHONE: 409-722-0241

3904074469 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
Suite 1200, 1015 Fifteenth Street, N.W.
Washington, D. C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-13-84
Date

Wayne E. Thomas
Signature

RESPONDENT'S NAME: Wayne E. Thomas

ADDRESS: P. O. Box 1917
Hereford, TX 79045

HOME PHONE: (806) 364-2563

BUSINESS PHONE: (806) 364-5700

2004074695

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Miller, Canfield, Paddock and Stone

ADDRESS: 1015 15th St. N.W., Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/14/94
Date

Mrs. Bettye Nowlin
Signature

RESPONDENT'S NAME: Mrs. Bettye Nowlin

ADDRESS: 510 Hazelwood Drive
Fort Worth, Texas 76107

HOME PHONE: (817) 732-2228

BUSINESS PHONE:

2204074496

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Miller, Canfield, Paddock and Stone

ADDRESS: 1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 13, 1984
Date

Signature R. L. Foree

Della Foree
Signature of Della Foree

RESPONDENT'S NAME: R. L. Foree

ADDRESS: 3300 InterFirst One Building
Dallas, Texas 75202

HOME PHONE: (214) 363 1114

BUSINESS PHONE: (214) 741-4607

2004074607

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-20-1984
Date

Thomas E. Hartin
Signature

RESPONDENT'S NAME: Thomas E. Hartin

ADDRESS: 5905 Club Oaks Dr.
Dallas, Texas 75248

HOME PHONE: 214/931-5591

BUSINESS PHONE: 214/392-4411

8204074698

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Jerry P. Fortenberry

ADDRESS: Corporate Counsel
Tenneco Inc.
P. O. Box 2511
Houston, TX 77001

TELEPHONE: (713) 757-3839

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 20, 1984
Date

A. J. Pate
Signature

RESPONDENT'S NAME: Tenneco Employees' Good Government Fund

ADDRESS: A. J. Pate
P. O. Box 2511
Houston, TX 77001

HOME PHONE:

BUSINESS PHONE: (713) 757-5610

2024074699

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC#5774
84 NOV 26 A9:42

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th St., NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

84 NOV 26 P12:05

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-19-84
Date

D Phil Bolin
Signature

RESPONDENT'S NAME: D. Phil Bolin

ADDRESS: 510 Hamilton Bldg.
Wichita Falls, Tx. 76301

HOME PHONE: (817) 767-5654

BUSINESS PHONE: (817) 723-7322

8204074700

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC
GCC #5156
84 NOV 23 A9:14

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

84 NOV 23 A10:2

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/19/84
Date

T.L. Roach Jr.
Signature T.L. Roach, Jr.

RESPONDENT'S NAME: T.L. Roach, Jr.

ADDRESS: P.O. Box 1871
Amarillo, Texas 79105

HOME PHONE: 806-373-5081

BUSINESS PHONE: 806-376-4371

9204007470

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84 NOV 19 P4:13
OCC#57925

ANDREWS & KURTH
ATTORNEYS
1747 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 861-7400
TELEX: 79-1208
TELECOPIER (202) 861-7437

TEXAS COMMERCE TOWER
HOUSTON, TEXAS 77002
(713) 220-4200

4400 THANKSGIVING TOWER
DALLAS, TEXAS 75201
(214) 979-4400

November 19, 1984

84 NOV 19 P4:52

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
Franklin Square North
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1837

Dear Mr. Steele:

Attached please find "Statement of Designation of Counsel" executed by Robert L. Bradley designating Michael F. Butler and the undersigned as counsel for Mr. Bradley in the above-captioned proceeding. Please continue to send any notifications and communications from the Commission directly to Mr. Bradley, as well as to the designated counsel.

Very truly yours,

Donald F. Santa, Jr.

Donald F. Santa, Jr.
Attorney for
Robert L. Bradley

DFS/crw
cc: Robert L. Bradley, Esquire
Michael F. Butler, Esquire

2204074702

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: MICHAEL F. BUTLER / DONALD F. SANTA

ADDRESS: ANDREWS & KURTH
1747 PENNSYLVANIA AVE., N.W.
WASHINGTON, D.C. 20006

TELEPHONE: (202) 861-7400

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-16-84
Date

Robert L. Bradley
Signature

RESPONDENT'S NAME: ROBERT L. BRADLEY

ADDRESS: 2200 WILLOWICK
#14C
HOUSTON, TEXAS 77027

HOME PHONE: (713) 961-0261

BUSINESS PHONE: (713) 220-4392

8904074703

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84 NOV 20 A10:17
DOC#5743

CONLEE SEED CO., INC.

November 19, 1984

84 NOV 20 P12:25

Federal Election Commission
Office of General Counsel
1325 K Street NW
Washington, D.C. 20463

Attn: Patty Reilly

Dear Patty,

Attached please find the copy of the Statement of Designation of Counsel in the MUR 1837 matter.

Should you need any additional information, please advise.

Yours very truly,

Douglas M. Conlee

Doug Conlee

Enclosure

DC/hb

8904074704

P.O. BOX 7247 • WACO, TEXAS 76714-7247 • 817-772-5680

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/16/01
Date

Douglas M. Conlee
Signature

RESPONDENT'S NAME: Douglas M. Conlee

ADDRESS: P.O. Box 7247
Waco, Texas 76714-7247

HOME PHONE: 817-772-2373

BUSINESS PHONE: 817-772-5680

8904074705

MUR #1837
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84 NOV 20 A 9:08

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1862-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

November 19, 1984

Patty Reilly, Esquire
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

HAND DELIVERED

Re: MUR 1837

Dear Ms. Reilly:

Enclosed please find additional signed Designation of Counsel forms designating our firm as counsel on behalf of the following unnamed respondents in the above-entitled MUR:

Frank P. Horlock	Houston, TX
A. P. McEvoy	Dallas, TX
James W. Arnold	Tyler, TX
Frank J. Scanio, Jr.	Woodsboro, TX
Clifton O. Overcash	Ft. Worth, TX
Richard A. Box	Austin, TX
Joan Kunitz	Sinton, TX
Richard T. Sink	Wichita Falls, TX
Donnald M. Carlton	Austin, TX
Mrs. Helen Allen	Houston, TX
Thomas T. Keeler	Corpus Christi, TX
Mrs. Helen Bankston	Dallas, TX
Mrs. Edith Huebner	San Antonio, TX
Mrs. Andrew Fasken	Paris, TX 75460

Additional respondents have contacted my office by telephone, and I anticipate more designations in the next few days.

Very truly yours,

MILLER CANFIELD PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb
Enclosures

8004074705

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James R. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9-13-84
Date

Signature Frank P. Horlock

RESPONDENT'S NAME: Frank P. Horlock

ADDRESS: P. O. Box 52608
Houston, Texas 77052

HOME PHONE:

BUSINESS PHONE: 713/666-3626

8204074707

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Miller, Canfield, Paddock and Stone

ADDRESS: 1015 15th Street, N.W., Suite 1200
Washington, DC 20005

(James F. Schoener, Esq.)

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-13-84
Date

Signature

RESPONDENT'S NAME: A. P. McEvoy

ADDRESS: 6301 Preston Parkway
Dallas, Texas 75205

HOME PHONE: 214/526-1594

BUSINESS PHONE: 214/245-7515

8204074708

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddolk and Stone
1015 15th Street, NW, Suite 1200
Washington, D. C. 20005

TELEPHONE: 202- 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 13, 1984
Date

Signature

RESPONDENT'S NAME: James W. Arnold

ADDRESS: P. O. Box 6566
Tyler, Texas 75711

HOME PHONE: 214- 592-2250

BUSINESS PHONE: 214- 561-4051

9204074709

STATEMENT OF DESIGNATION OF COUNSEL

MUR MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER, ESQ.

ADDRESS: MILLER, CANFIELD, PADDOCK + STONE
1015 15th ST., NW, SUITE 1200
WASHINGTON, DC 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-13-84
Date

Frank J. Scanio, Jr.
Signature

RESPONDENT'S NAME: FRANK J. SCANIO, JR.

ADDRESS: P.O. BOX 7
LA ROSA RANCH
WOODSBORO, TEXAS 78393

HOME PHONE: 512-543-4407

BUSINESS PHONE: 512-543-4533

2204074710

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Miller, Canfield, Paddock & Stone

ADDRESS: Suite 1200 - 1015 Fifteenth Street, NW

Washington, D. C. 20005

ATTN: James F. Schoener, Esq.

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 12, 1984
Date

Signature

RESPONDENT'S NAME: Clifton O. Overcash

ADDRESS: 2501 Parkview Drive, Suite 300

Fort Worth, TX 76102

3850 Bellaire Circle - Ft. Worth, TX 76109 (home)

HOME PHONE: (817) 927-5092

BUSINESS PHONE: (817) 335-4555

2004074711

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 12, 1984
Date

Richard A. Box
Signature

RESPONDENT'S NAME: Richard A. Box

ADDRESS: 711 W 38th, Suite D-2
Austin, Tx 78705

HOME PHONE: 512/459-7689 474-7077

BUSINESS PHONE: 512/459-7689

2004074712

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Miller, Canfield, Paddock & Stone

ADDRESS: Suite 1200
1015 Fifteenth St. N.W.
Washington, D.C. 20005

TELEPHONE: (202) 789-840

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov 13, 1984
Date

Joan Kuntz
Signature

RESPONDENT'S NAME: JOAN KUNTZ

ADDRESS: Box 1053
SINTON, TEXAS 78387

HOME PHONE: 512-364-1336

BUSINESS PHONE: 512-364-3400

2004074713

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

Richard T. Sink
Signature

RESPONDENT'S NAME: RICHARD T. SINK

ADDRESS: P.O. BOX MWH
WICHITA FALLS, TX 76307

HOME PHONE: 817/767-2764

BUSINESS PHONE: 817/723-1471

2024074714

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES SCHOENER

ADDRESS: 1015 15TH ST. NW. #1200
WASHINGTON, D.C. 20005

TELEPHONE: 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

Donald M. Carlton
Signature

RESPONDENT'S NAME: DONALD M. CARLTON

ADDRESS: 4601 CAT MOUNTAIN DR.
AUSTIN, TX 78731

HOME PHONE: 512-345-1110

BUSINESS PHONE: 454-4797

8204074715

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: [redacted] ✔James F. Schoener, Esq.

ADDRESS: [redacted] Miller, Canfield, Paddock & Stone
1015 15th Street, N.W.
Suite 1200
Washington, D. C. 20005

TELEPHONE: [redacted] (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9 November 1984
Date

Mrs. Helen Allen
Signature

RESPONDENT'S NAME: Mrs. Helen Allen

ADDRESS: 3207 Groveland Lane
Houston, Texas 77019

HOME PHONE: (713) 523-8119

BUSINESS PHONE: (713) 939-2201

8004074716

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th St., NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 13, 1984
Date

Signature

RESPONDENT'S NAME: Thomas T. Keeler

ADDRESS: P.O. Box 7535
Corpus Christi, Texas 78415

HOME PHONE: (512) 853-5269

BUSINESS PHONE: (512) 883-3991

8204074717

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

/ Helen B Bankston
Signature

RESPONDENT'S NAME: Mrs Helen Bankston

ADDRESS: 4747 LBJ Fwy
Dallas, Tx 75234

HOME PHONE: (214) 931-5121

BUSINESS PHONE: (214) 386 8210

8204074718

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15St N. W. Suite #1200
Washington, D. C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 12, 1984
Date

Edith Huebner
Signature

RESPONDENT'S NAME: Mrs. Edith Huebner

ADDRESS: P. O. Drawer 20350
San Antonio, Texas 78286

HOME PHONE: (512) 824-1260

BUSINESS PHONE: (512) 661-4251

2024074719

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1877

NAME OF COUNSEL: Miller, Canfield, Paddock, + Stone

ADDRESS: 1015 15TH ST SUITE 1200

WASHINGTON, D.C.

TELEPHONE: 789 8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

A Mrs. Andrew Fasken
Signature

RESPONDENT'S NAME: Mrs. Andrew Fasken

ADDRESS: 3146 Clark Ln

Paris, TX 75460

HOME PHONE: (214) 785-3778

BUSINESS PHONE: (214) 785-0321

8 9 0 4 0 7 4 4 7 2 0

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC #5712
84 NOV 19 P12:11

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

RECEIVED
84 NOV 19 P12:55

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-16-84
Date

Harvey Huie
Signature

RESPONDENT'S NAME: Harvey Huie

ADDRESS: P. O. Box 802331
Dallas, Texas 75380-2331

HOME PHONE: (214) 239-1885

BUSINESS PHONE: (214) 980-4170

9004074472 1

LAW OFFICES OF
BOB PARKS
305 EAST FOURTH - P O BOX 1438
MONAHANS, TEXAS 79756

BOB PARKS
ROBERT E. HOLLMANN

TELEPHONE
(915) 943-2755

RECEIVED AT THE FEC
GC/HS/109
84 NOV 19 P12:13

November 16, 1984

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

Attn: Kenneth A. Gross, Esquire
Associate General Counsel
and
Patty Reilly, Staff Person

84 NOV 19 P12:56

Re: MUR 1837

Gentlemen:

Here is the executed Statement of Designation of Counsel in connection with the above captioned matter.

Thank you very much.

Very truly yours,

Bob Parks

Bob Parks

BP/ca
Enc.

2 2 0 4 0 7 4 4 7 2 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Bob Parks

ADDRESS: Post Office Box 1438
Monahans, Texas 79756

TELEPHONE: 915-943-2755

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-16-84
Date

Jessie V. Kniveton
Signature JESSIE V. KNIVETON

RESPONDENT'S NAME: Jessie V. Kniveton

ADDRESS: 1506 South Ike
Monahans, Texas 79756

HOME PHONE: 915-943-2286

BUSINESS PHONE: N/A

2024074723

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC#5768
84 NOV 23 AM : 07

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-15-84
Date

Ebby Halliday Acers
Signature
Ebby Halliday Acers

RESPONDENT'S NAME: Ebby Halliday Acers

ADDRESS: P. O. Box 12348
Dallas, Texas 75225

HOME PHONE: (214) 368-1866

BUSINESS PHONE: (214) 980-6666

8204074724

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Jim McDermett

ADDRESS:

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-15-84
Date

Signature

RESPONDENT'S NAME: C. J. Allen

ADDRESS: P.O. Box 3902
Bryan, Tx. 77805

HOME PHONE: (409) 779-8567

BUSINESS PHONE: (409) 779-3516

2004074725

LAWRENCE & LAWRENCE
ATTORNEYS AT LAW
TELEPHONE 214-597-8301
TYLER, TEXAS

W. DEWEY LAWRENCE (1898-1971)
WILLIAM D. LAWRENCE, JR.
F. LEE LAWRENCE
MICHAEL J. McNALLY
RUSSELL W. COOPER
STEVEN R. SIMS
DONALD A. McLACHLAN

OFFICE ADDRESS
215 REPUBLICBANK TYLER BLDG.
MAILING ADDRESS
POST OFFICE BOX 180
75710-0180

RECEIVED BY THE FEC
GCC# 5678
84 NOV 19 A10:03

November 15, 1984

84 NOV 19 A11:46

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

Re: MUR 1837
Bruce G. Brookshire

Gentlemen:

In partial response to your notification to Mr. Bruce G. Brookshire of Tyler, Texas, dated November 1, 1984, referencing the above matter, please find enclosed and be advised that Mr. Brookshire is designating Mr. James F. Schoener of the Washington, D. C. Bar as counsel for him in this matter.

Please find enclosed his written statement of such designation.

Very truly yours,

LAWRENCE & LAWRENCE

Wm. D. Lawrence, Jr.

WDL,jr/jw
Enc.

cc: James F. Schoener, Esq.

9 9 0 4 0 7 4 4 7 2 5

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15,1984
Date

Bruce G. Brookshire
Signature

RESPONDENT'S NAME: Bruce G. Brookshire

ADDRESS: c/o Lawrence & Lawrence
Attorneys at Law
215 RepublicBank Tyler
Tyler, Texas 75702

HOME PHONE:

BUSINESS PHONE: 214/597-6301

2004074727

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCO# 5730
84 NOV 20 A8:57

MUR _____

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th Street, N.W., Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

RECEIVED
FEC MAIL CENTER
84 NOV 20 A10:05

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/15/84
Date

Signature

RESPONDENT'S NAME: Robert E. Windom, M.D.

ADDRESS: 1562 South Drive
Sarasota, Florida 33579

HOME PHONE: 366-1550

BUSINESS PHONE: 366-8330

2040747728

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th Street, N.W. Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-15-84
Date

Lelia H. Windom
Signature

RESPONDENT'S NAME: Lelia H. Windom

ADDRESS: 1562 South Drive
Sarasota, Florida 33579

HOME PHONE: 366-1550

BUSINESS PHONE: n/a

2004074729

RECEIVED AT THE FEC
G-CC#5739
84 NOV 20 A11 : 58

LAW OFFICES OF
COX & SMITH
INCORPORATED
600 NATIONAL BANK OF COMMERCE BUILDING
SAN ANTONIO, TEXAS 78205

TELEPHONE (512) 226-7000
TELEX 767609

JOHN J. COX (1905-1971)

J. BURLESON SMITH
PAUL H. SMITH
JAMES R. HALE
JACK GUENTHER
DAVID C. SPOOR
DAN G. WEBSTER III
RICHARD T. BRADY
JOE P. SMYER
WILLIAM R. SIMCOCK
EUGENE B. LABAY
WAYNE T. WEBER
TERRY S. BICKERTON
DONALD R. COMUZZI
KEITH E. KAISER
R. LAURENCE MACON
LURALEE H. WALLACE
WILLIAM H. LEMONS III
PATRICK K. SHEEHAN
JAMES C. NORMAN
W. THOMAS WEIR
WARD T. BLACKLOCK, JR.
J. MICHAEL WILKES
JON R. RAY
CHARLES W. HANOR
WALTER J. BATLA
GALE R. PETERSON
JAMES B. SMITH, JR.
STANLEY E. CRAWFORD, JR.
ANDY A. TSCHOEPE II
CYNTHIA J. WIENS
DIANN M. BARTEK
LEIF M. CLARK
BARRON W. DOWLING
WILLIAM H. LESTER, JR.
A. MICHAEL FERRILL
C. BENJAMIN McCALEB
DEBORAH D. WILLIAMSON
MARY L. BRENNAN
CYNTHIA J. ESTEE
THOMAS A. COUNTRYMAN
CARY L. PLOTKIN
SYDNEY MEADE BAUER
STEPHEN D. SEIDEL
REBECCA SIMMONS
CHARLES M. HORNBERGER
DREW R. FULLER, JR.
MARK R. WISNER
RANDALL GAY
ROBERT B. WERNER
DENNIS E. NOLL*

*ADMITTED IN LOUISIANA ONLY

November 15, 1984

84 NOV 20 P12: 25

Federal Election Commission
Washington, D.C. 20463

Attention: Kenneth A. Gross, Esq.
Associate General Counsel

Re: MUR 1837

Gentlemen:

In response to your letter of November 1, 1984 addressed to Gen. Sam Maddux, Jr. concerning the captioned matter under investigation, we herewith submit in behalf of our client, Lt. Gen. Maddux, a Statement of Designation of Counsel whereby James F. Schoener, Esq. of Washington, D.C. is designated as counsel for Gen. Maddux.

Yours very truly,

Paul H. Smith

PHS:ab
Enclosure
Certified Mail P594 215 214
Return Receipt Requested

cc: Lt. Gen. Sam Maddux, Jr.
500 Alameda Circle
San Antonio, Texas 78212

cc: James F. Schoener, Esq.
Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

8 9 0 4 0 7 4 4 7 3 0

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC

84 NOV 20 AM : 58

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

Sam Maddux, Jr.
Signature
Lt. Gen. Sam Maddux, Jr. by PJS

RESPONDENT'S NAME: Lt. Gen. Sam Maddux, Jr.

ADDRESS: 500 Alameda Circle
San Antonio, Texas 78212

HOME PHONE: 512/822-5343

BUSINESS PHONE: 512/820-0113

8904074473 1

GCC#5658
RECEIVED AT THE FEC
HAND DELIVERED
84 NOV 16 A9:14

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1926)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

November 15, 1984

Patty Reilly, Esquire
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

HAND DELIVERED

Re: MUR 1837

Dear Ms. Reilly:

Enclosed please find signed Designation of Counsel forms designating our firm as counsel on behalf of the following respondents in the above-entitled MUR:

George S. Hawn	Corpus Christi, TX
Laurie Ramsey	Wichita Falls, TX
L. A. McNeil	Corpus Christi, TX
Hogan T. Brooks	Conroe, TX
Othal E. Brand	McAllen, TX
William H. Crain	Austin, TX
Michelle K. Connor	Houston, TX
James Lewis Connor	Houston, TX
J. I. Jackson	Fort Worth, TX
William G. Cass	Dallas, TX
Michael L. Cass	Dallas, TX
Mary G. Cass	Dallas, TX
Frank Cass	Dallas, TX
John H. White	San Antonio, TX
Alvis Arthur	Irving, TX
Roland Arthur	Irving, TX
Lewis W. Kreditor	Dallas, TX

NOV 16 A10:39

Other respondents have contacted my office by telephone and I anticipate additional designations in the next few days.

I appreciate your granting a 30-day continuance in the time to respond, and I assume that the same will apply to the respondents who were added by the FEC.

Very truly yours,

MILLER CANFIELD PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb
Enclosure

9004074732

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 207/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov. 11, 1984
Date

Signature

RESPONDENT'S NAME: George S. Hawn

ADDRESS: 101 N. Shoreline, Suite 400
Corpus Christi, TX 78401

HOME PHONE: 512/749-5493

BUSINESS PHONE: 512/882-5435

8904074473 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F SCHOENER, ESq.

ADDRESS: MILLER, CANFIELD, PADDOCK & STONE
1015 15TH ST., NW, SUITE 1200
WASHINGTON, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12/84
Date

Laurie Ramsey
Signature

RESPONDENT'S NAME: LAURIE RAMSEY

ADDRESS: 3510 CRANBROOK
WICHITA FALLS, TX 76308

HOME PHONE: (817) 692-8830

BUSINESS PHONE: (817) 322-8635

8907447734

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES SCHOENER

ADDRESS: MILLER CANFIELD PADDOCK + STONE
1015 15TH ST. NW #1200
WASHINGTON, D.C. 20005

TELEPHONE: 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-12-84
Date

L.A. McNeil
Signature

RESPONDENT'S NAME: L. A. McNEIL

ADDRESS: PO BOX 2928
CORPUS CHRISTI, TEX 78403

HOME PHONE: (512) 991-4189

BUSINESS PHONE: (512) 888-9301

9004074735

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12/84
Date

Hogan Brooks
Signature
Henry T. Brooks, his father

RESPONDENT'S NAME: Hogan T. Brooks

ADDRESS: #2 Granby Terrace (P.O. Box 1421)
Conroe, Texas 77305

HOME PHONE: (409) 756-6998

BUSINESS PHONE: (409) 539-1755

2024074735

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James Schoener
Miller, Canfield, Paddock & Stone

ADDRESS: Suite 800
1015 15th St. NW
Washington, D.C. 20005

TELEPHONE: (202) 789 8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-2-84
Date

Othal E Brand by D R Shaner
Signature

RESPONDENT'S NAME: Othal E Brand

ADDRESS: P.O Box 1840
McAllen 78501

HOME PHONE: 512 686 5925

BUSINESS PHONE: 512 682 6181

8904074737

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER, ESQ.

ADDRESS: MILLER, CANFIELD, PADDOCK AND STONE
1015 15TH STREET, NW, SUITE 1200
WASHINGTON, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 12, 1984
Date

William H. Crain
Signature

RESPONDENT'S NAME: WILLIAM H. CRAIN

ADDRESS: 2511 SAN GABRIEL ST.
AUSTIN, TEXAS 78705

HOME PHONE: (512) 478-6244

BUSINESS PHONE: (512) 477-9122

8204073738

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F Schoener Esquire

ADDRESS: Miller Canfield Paddock & Stone
1015 15th Street NW, Suite 1200
Washington D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 13, 1984
Date

Michelle K Connor
Signature

RESPONDENT'S NAME: Michelle K Connor

ADDRESS: 3020 Duke
Houston TX 77005

HOME PHONE: (713) 667-6449

BUSINESS PHONE: (713) 667-6449

89040714739

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F SCHOENER ESQ

ADDRESS: MILLER CANFIELD PADDOCK & STONE.
1015 15TH STREET NW SUITE 1200.
WASHINGTON DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 13 1984
Date

James Lewis Connor III
Signature

RESPONDENT'S NAME: James Lewis Connor III

ADDRESS: 3020 Duke
Houston TX 77005

HOME PHONE: (713) 667-6449

BUSINESS PHONE: (713) 667-6449

8904074740

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone

1015 15th Street, NW, Suite 1200

Washington, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-12-84
Date

J. I. Jackson
Signature

RESPONDENT'S NAME: J. I. Jackson

ADDRESS: 3880 Hulen Street Suite 329

Fort Worth, Texas 76107

HOME PHONE: 817/924-9116

BUSINESS PHONE: 817/763-5387

8904077741

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER

ADDRESS: MILLER CANFIELD PADDOCK + STONE
1015 15TH ST. SUITE 1200
WASHINGTON, D.C. 20005

TELEPHONE: 7898640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12/84
Date

William G. Cass
Signature

RESPONDENT'S NAME: William G. Cass

ADDRESS: 2727 Routh Street
Dallas, Texas 75201

HOME PHONE: 214/373-6714

BUSINESS PHONE: 214/747-1946

9904074742

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1937

NAME OF COUNSEL: JAMES F. SCHOENER

ADDRESS: 1015 15TH ST. NW.
SUITE 1200
WASHINGTON, D.C. 20005

TELEPHONE: 789 8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12/84
Date

Michael Cass
Signature

RESPONDENT'S NAME: Michael L. Cass

ADDRESS: 2727 Routh Street
Dallas, Texas 75201

HOME PHONE: 214/692-9328

BUSINESS PHONE: 214/747-1946

2004074743

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER

ADDRESS: 1015 15TH ST. NW.
Suite 1200
WASHINGTON, D.C. 20005

TELEPHONE: 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12/84
Date

Mary D. Cass
Signature

RESPONDENT'S NAME: Mary D. Cass

ADDRESS: 2727 Routh Street
Dallas, Texas 75201

HOME PHONE: 214-358-3295

BUSINESS PHONE: 214-747-1946

3904074744

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES SCHOENER

ADDRESS: 1015 15TH ST. NW.
SUITE 1200
WASHINGTON D.C. 20005

TELEPHONE: 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12/84
Date

Frank Cass
Signature

RESPONDENT'S NAME: Frank Cass

ADDRESS: 2727 Routh Street
Dallas, Texas 75201

HOME PHONE: 214-358-3295

BUSINESS PHONE: 214-747-1946

8904074745

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener Esq

ADDRESS: 1015 15th St. N.W Suite 1200
Washington D.C.
20005

TELEPHONE:

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission. I also wish to receive notifications.

11-12-84
Date

John H. White
Signature

RESPONDENT'S NAME: John H. White

ADDRESS: Box 16309
800 Isom Rd
San Antonio Tx 78216

HOME PHONE:

BUSINESS PHONE: 512 349 8822

8204074746

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F SCHOGNER, Miller, Canfield, Paddock and Stone

ADDRESS: 1015 15th. St., NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 12, 1984
Date

Signature

RESPONDENT'S NAME: Alvis Arthur

ADDRESS: P.O. BOX 153648
Irving, Tx. 75015

HOME PHONE:

BUSINESS PHONE: (214) 986-0500

8204077447

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER, Miller, Canfield, Paddock and Stone

ADDRESS: 1015 15th. St., NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 12, 1984
Date

Signature

RESPONDENT'S NAME: Roland Arthur

ADDRESS: P.O. BOX 153648
Irving, Tx. 75015

HOME PHONE:

BUSINESS PHONE: (214) 986-0500

8904007748

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER, Esq.

ADDRESS: 1015 15th Street N. W.
Suite #1200
Washington, D. C. 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-12-84
Date

Louis W. Kreditor
Signature

RESPONDENT'S NAME: Louis W. Kreditor

ADDRESS: 1365 Regal Row
Dallas, Texas 75247

HOME PHONE: 214-361-0073

BUSINESS PHONE: 214-637-5300 EXT. #405

8204077749

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: J. Patrick Berry

ADDRESS: Baker & Botts
1701 Pennsylvania Ave., NW
Washington, DC 20006

TELEPHONE: (202) 457-5546

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

David M. McClanahan
Signature
David M. McClanahan
Treasurer

RESPONDENT'S NAME: Houston Industries Political Action Committee

ADDRESS: P.O. Box 1700
611 Walker Street
Houston, TX 77001

~~HOME PHONE~~:

BUSINESS PHONE: (713) 229-7422

9204074750

GCC#5662
RECEIVED BY THE FEC
HAND DELIVERED
84 NOV 16 AM 11:06

84 NOV 16 P12:13

RECEIVED BY THE FEC
GCG#5738
84 NOV 20 A8:44

CHESTER R. UPHAM, JR.
999 ENERGY AVENUE
P. O. BOX 940
MINERAL WELLS, TEXAS 76067
TELEPHONE (817) 325-4491

November 14, 1984

84 NOV 20 A10:06

Mr. Charles N. Steele, General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR 1837

Gentlemen:

My wife is in receipt of your letter of November 1st and she has asked me to respond. Please find enclosed a copy of her Statement of Designation of Counsel naming James F. Schoener to represent her. I will appreciate your directing future communications to Mr. Schoener.

Very truly yours,

Chester R. Upham, Jr.

CRU:jlg

Enclosure

cc: Mr. James F. Schoener

2004047511

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-14-84
Date

Signature

RESPONDENT'S NAME: Mrs. Chester R. Upham, Jr. (Virginia)

ADDRESS: P. O. Box 940
Mineral Wells, Texas 76067

HOME PHONE: _____

BUSINESS PHONE: 817-325-4491

9204074752

RECEIVED BY THE FEC
GCC#5675
84 NOV 19 A10:07

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Miller, Canfield, Paddock and Stone

ADDRESS: 1015 15th St. N.W., Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

84 NOV 19 A11:45

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/14/84
Date

Mrs. Bettye Nowlin
Signature

RESPONDENT'S NAME: Mrs. Bettye Nowlin

ADDRESS: 510 Hazelwood Drive
Fort Worth, Texas 76107

HOME PHONE: (817) 732-2226

BUSINESS PHONE:

9904074753

MRS. WADE NOWLIN
510 HAZELWOOD PH. 732-2228
FORT WORTH, TEXAS 76107

1159

8/23 19 84

37-7388
3119

PAY TO THE ORDER OF Presidential Nomination Buffet $ 1,000 00

One Thousand and 00/100 DOLLARS

NOWLIN SAVINGS
HOME OFFICE: Fort Worth, Texas

FOR Phil Gramm Mrs Wade Nowlin

⑈311973884⑈057151228409⑈ 1159 ⑈0000100000⑈

MRS. WADE NOWLIN
510 HAZELWOOD PH. 732-2228
FORT WORTH, TEXAS 76107

1144

8/14 19 84

37-7388
3119

PAY TO THE ORDER OF Phil Gramm for Senate $ 1,000.00

One Thousand and 00/100 DOLLARS

NOWLIN SAVINGS
HOME OFFICE: Fort Worth, Texas

FOR Primary debt retention Mrs Wade Nowlin

⑈311973884⑈057151228409⑈ 1144 ⑈0000100000⑈

8 9 0 4 0 7 4 4 7 5 4

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCL#5694
84 NOV 19 A8:44

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: 1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov. 14, 1984
Date

Catharine W. McAnally
Signature

RESPONDENT'S NAME: CATHARINE W. McANALLY

ADDRESS: Office: P.O. Box 9595
AMARILLO, TEXAS 79105

HOME PHONE: (806) ~~374-1351~~ 353-4556

BUSINESS PHONE: (806) 374-1351

8904074755

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC# 5697
84 NOV 19 A 8:48

MUR _____

NAME OF COUNSEL: I have no intention of
ADDRESS: having a lawyer

TELEPHONE: _____

84 NOV 19 A11:48
GENERAL COUNSEL

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/14/84
Date

N M Yost
Signature

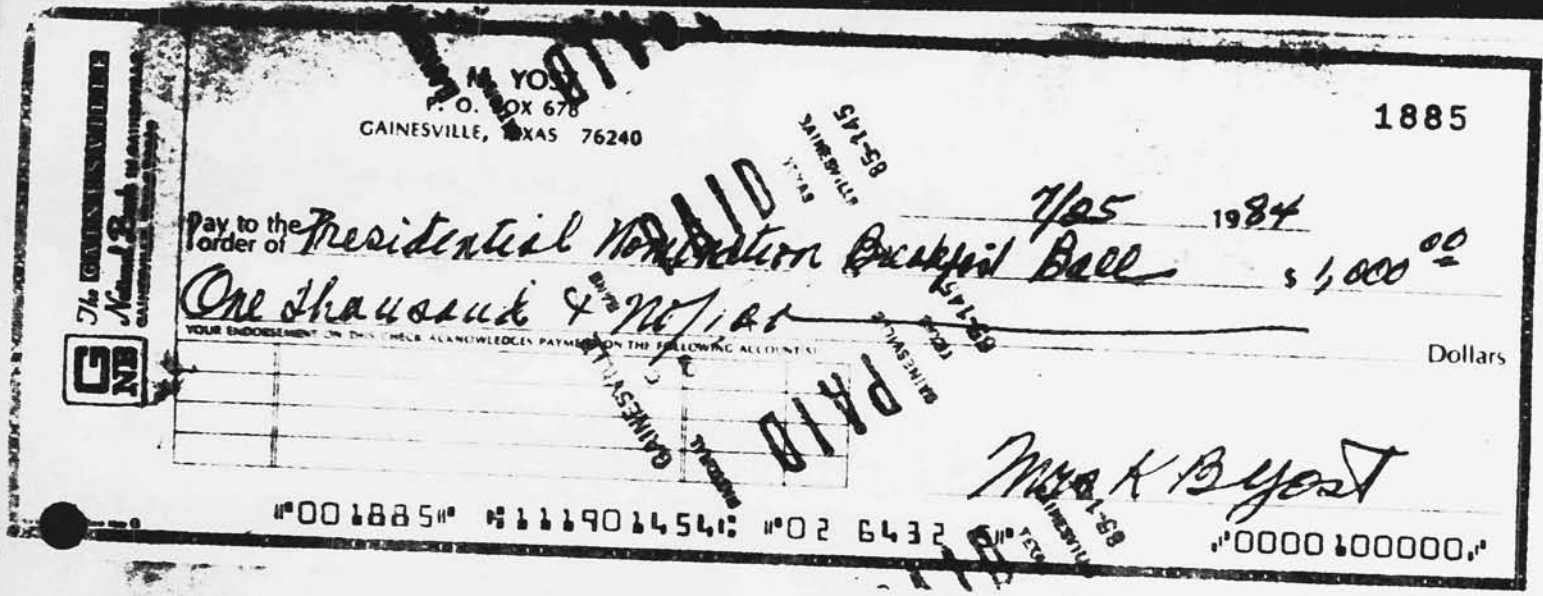
RESPONDENT'S NAME: N. M. Yost
ADDRESS: Box 678
Gainesville
Tex

HOME PHONE: (817) 665-5030
BUSINESS PHONE: (817) 665-5121

On 7/25/84 I donated to GOP Presidential Nomination Ball $1,000.00 Invitation It was sent by Lower for President and Gramm
N M Yost

Enclosed is a copy of Myck
1885

8 9 0 4 0 7 4 4 7 5 6



The GAINESVILLE National Bank
GAINESVILLE, TEXAS 76240

M. YOST
P. O. BOX 678
GAINESVILLE, TEXAS 76240

1885

7/25 1984

Pay to the order of Presidential Nomination Breakfast Ball $ 1,000.00

One thousand & No/100 Dollars

YOUR ENDORSEMENT ON THIS CHECK ACKNOWLEDGES PAYMENT ON THE FOLLOWING ACCOUNT(S)

PAID

PAID

Mrs K B Yost

⑈001885⑈ ⑆111901454⑆ ⑈02 6432 ⑈ ⑈0000100000⑈

R 9-0 4 0 7 4 4 7 5 7

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCL#5669
84 NOV 16 AM : 40

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

84 NOV 16 P12:44
GENERAL COUNSEL

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/14/84
Date

Signature

RESPONDENT'S NAME: Harold D. Courson

ADDRESS: Box 809
Perryton, TX 79070

HOME PHONE: (806) 435-3122

BUSINESS PHONE: (806) 435-2910

8204074758

STATEMENT OF DESIGNATION OF COUNSEL

GCA#5656
RECEIVED AT THE FEC

84 NOV 16 A9:15

MUR _____

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202-789-8640

84 NOV 16 A10:08
GENERAL COUNSEL'S OFFICE

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/14/84
Date

Richard E. Doornbos
Signature

RESPONDENT'S NAME: Richard E. Doornbos

ADDRESS: 3304 Tipps
Nederland, TX

HOME PHONE: 409-727-3063

BUSINESS PHONE: 409-722-0241

8204074759

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC #5699
84 NOV 19 A8:49

MUR 1837

NAME OF COUNSEL: James F Schoener, Esquire

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 13, 1984
Date

Michelle K Connor
Signature

RESPONDENT'S NAME: Michelle K Connor

ADDRESS: 3020 Duke
Houston TX 77005

HOME PHONE: (713) 667-6449

BUSINESS PHONE: (713) 667-6449

2204074476O

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: JAMES F SCHOENER, ESQ.

ADDRESS: MILLER, CANFIELD, PADDOCK & STONE.
1015 15TH STREET, NW SUITE 1200.
WASHINGTON, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 13, 1984
Date

James Lewis Connor III
Signature

RESPONDENT'S NAME: James Lewis Connor III

ADDRESS: 3020 Duke
Houston TX 77005

HOME PHONE: (713) 667-6449

BUSINESS PHONE: (713) 667-6449

8204074761

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC
GCC#5700
84 NOV 19 A8:49

MUR _____

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
Suite 1200, 1015 Fifteenth Street, N.W.
Washington, D. C. 20005

TELEPHONE: (202) 789-8640

84 NOV 19 A11:48
GENERAL COUNSEL

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-13-84
Date

Wayne E. Thomas
Signature

RESPONDENT'S NAME: Wayne E. Thomas

ADDRESS: P. O. Box 1917
Hereford, TX 79045

HOME PHONE: (806) 364-2563

BUSINESS PHONE: (806) 364-5700

9204074762

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC#5491
84 NOV 19 A8:48

MUR 1837

NAME OF COUNSEL: Miller, Canfield Paddock and Stone
ATT: James F. Schoener, Esq.

ADDRESS: 1015 15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

84 NOV 19 A11:47
GENERAL COUNSEL

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

William H. Martin
William H. Martin
Signature

RESPONDENT'S NAME: William H. Martin

ADDRESS: 1804 First Nat'l Bank Bldg.
Midland, Texas 79701

HOME PHONE: 915-682-8122

BUSINESS PHONE: 915-682-5216

8204074476 3

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC
GCC#5692
84 NOV 19 A8:44

MUR 1837

NAME OF COUNSEL: Miller, Canfield, Paddock and Stone

ADDRESS: Att: James F. Schoener, Esq.
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

NOV 19 A11:47

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

Karen V. Martin
Karen V. Martin
Signature

RESPONDENT'S NAME: Karen V. Martin

ADDRESS: 1404 Country Club Drive
Midland, Texas 79701

HOME PHONE: 915/682-8122

BUSINESS PHONE:

8204074764

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC

GC#6736

84 NOV 20 A 8:44

MUR 1837

NAME OF COUNSEL: James E. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-13-84
Date

Signature

RESPONDENT'S NAME: Fred S. Brown

ADDRESS: P. O. Box 688
Mexia, Tx. 76667

HOME PHONE: (817) 562-2818

BUSINESS PHONE: (817) 562-2818

8204074765

RECEIVED AT THE FEC
GCC#5676
84 NOV 19 A8:49

JAMES W. ARNOLD
TYLER, TEXAS

November 13, 1984

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Dear Mr. Gross:

I am enclosing signed statement of designation of counsel concerning MUR #1837.

Yours very truly,

James W. Arnold
P. O. Box 6566
Tyler, Texas 75711

JWA:ls

Enc.

8 9 0 4 0 7 4 4 7 5 6

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddolk and Stone
1015 15th Street, NW, Suite 1200
Washington, D. C. 20005

TELEPHONE: 202- 789-8640

84 NOV 19 AM 11:48

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 13, 1984
Date

Signature

RESPONDENT'S NAME: James W. Arnold

ADDRESS: P. O. Box 6566
Tyler, Texas 75711

HOME PHONE: 214 - 592-2250

BUSINESS PHONE: 214 - 561-4051

8 9 0 4 0 7 4 4 7 6 7

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC#5668.
84 NOV 16 AM : 11

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: 202/789-8640

84 NOV 16 P12:44
OFFICE OF GENERAL COUNSEL

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/13/84
Date

Richard T. Sink
Signature

RESPONDENT'S NAME: RICHARD T. SINK

ADDRESS: P.O. BOX MWH
WICHITA FALLS, TX 76307

HOME PHONE: 817/767-2764

BUSINESS PHONE: 817/723-1471

8200749768

P O Box 1239

ROBERT L. WHEELOCK, JR.
INVESTMENTS, OIL AND RANCHING
FIRST NATIONAL BANK BUILDING
CORSICANA, TEXAS 75110

Phone 214 [illegible] 7451

RECEIVED AT THE FEC
GCC# 5667
84 NOV 16 A11:46

84 NOV 16 P12:44

GENERAL COUNSEL

November 13, 1984

James F. Schoener, Esq.
Miller, Canfield, Paddock & Stone
1015 15th Street, NW, Suite 1200
Washington, D.C. 2005

RE: MUR 1837

Dear Mr. Schoener:

I appreciate your astute attention in this matter and enclosed you will find a copy of the necessary form that was sent to me by the Federal Election Commission.

Yours very truly,

Robt L Wheelock Jr.

Robt. L. Wheelock, Jr.

RLW:bb
Encl.

cc: Kenneth A. Gross
Federal Election Commission

8 9 0 4 0 7 4 4 7 5 9

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq. of the firm of Miller, Canfield, Paddock & Stone

ADDRESS: Suite 1200
1015 Fifteenth Street, N.W.
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-13-84
Date

Robt. L. Wheelock, Jr.
Signature

RESPONDENT'S NAME: Robt. L. Wheelock, Jr.

ADDRESS: P.O. Box 1239
Corsicana, Texas 75110

HOME PHONE: (214) 874-6932

BUSINESS PHONE: (214) 874-7451

2004074770

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC#5647
84 NOV 16 AM : 61

MUR 1837

NAME OF COUNSEL: James R. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

84 NOV 16 P12:44
GENERAL COUNSEL

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9-13-84
Date

Frank P. Horlock
Signature

RESPONDENT'S NAME: Frank P. Horlock

ADDRESS: P. O. Box 52608
Houston, Texas 77052

HOME PHONE:

BUSINESS PHONE: 713/666-3626

8004074771

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC#5655
84 NOV 16 A9:15

MUR -1837-

NAME OF COUNSEL: JAMES F. SCHOENER

ADDRESS: MILLER, CANFIELD, PADDOCK & STONE
1015 15TH ST N W, SUITE 1200
WASHINGTON, D.C. 20005

TELEPHONE: (202) 789-8640

84 NOV 16 A10:08

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov 13, 1984
Date

David M. Crowley
Signature

RESPONDENT'S NAME: DAVID M CROWLEY

ADDRESS: 10205 INWOOD ROAD
DALLAS, TX 75229

HOME PHONE: (214) 361-0677

BUSINESS PHONE: (214) 386-1000

8204077

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC# 5657
84 NOV 16 A9:15

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th St., NW, Suite 1200
Washington, D.C. 20005

TELEPHONE: (202) 789-8640

84 NOV 16 A11:30
CENTRAL

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 13, 1984
Date

Signature

RESPONDENT'S NAME: Thomas T. Keeler

ADDRESS: P.O. Box 7535
Corpus Christi, Texas 78415

HOME PHONE: (512) 853-5269

BUSINESS PHONE: (512) 883-3991

0074777

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Thomas T. Keeler
P.O. Box 7535
Corpus Christi, TX 78415

RE: MUR 1837

Dear Mr. Keeler:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that you violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

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

If you have any questions, please contact Patty Reilly, the staff person assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope

8904074773

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC
OGC #5677
84 NOV 19 A10:00

MUR 1837

NAME OF COUNSEL: JAMES F. SCHOENER, ESQ.

ADDRESS: MILLER, CANFIELD, PADDOCK & STONE
1015 15th ST., N.W., SUITE 1200
WASHINGTON, D.C. 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12/84
Date

Wilton H. Fair
Signature

RESPONDENT'S NAME: WILTON H. FAIR

ADDRESS: P.O. Box 689
TYLER, TX. 75710

HOME PHONE: 214/561-3245

BUSINESS PHONE: 214/592-3811 EXT. 23

84 NOV 19 A11:46

8 9 0 4 0 0 7 4 4 7 7 6

MCA 5569

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC
HAND DELIVERED
84 NOV 13 A8:55

MUR 1837

NAME OF COUNSEL: Edward H. Forgotson

ADDRESS: or
Robert Braeger
Attorneys at Law
Beveridge & Diamond, P.C.
1333 New Hampshire Avenue, N.W.
Washington DC 20036

TELEPHONE: 202/828-0200

84 NOV 13 PM 5:

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 12, 1984
Date

Paige Pickens
Signature

RESPONDENT'S NAME: Ms. Paige Pickens

ADDRESS: 3926 Potomac
Dallas, Texas 75206

HOME PHONE: 214/526-8476

BUSINESS PHONE: 214/369-7471

8004074777

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC
HAND DELIVERED
84 NOV 13 A 8:54

MUR 1837

NAME OF COUNSEL: Edward H. Forgotson or
Robert Braeger
Attorneys-at-Law

ADDRESS: Beveridge & Diamond, P.C.
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

TELEPHONE: 202/828-0200

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 12, 1984
Date

Anne Alison Pickens
Signature

RESPONDENT'S NAME: Ms. Anne Pickens

ADDRESS: 3926 Potomac
Dallas, Texas 75206

HOME PHONE: 214/526-8476

BUSINESS PHONE: 214/369-7471

R 0 0 4 0 7 4 7 7 8

MCC #5570

RECEIVED AT 5570 FEC

HAND DELIVERED

84 NOV 13 A 8:51

Union Pacific Corporation

W. Dan Boone
Public Affairs Counsel

November 12, 1984

84 NOV 13 P 1:22

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Franklin Square North
Washington, D.C. 20463

MUR 1837

Dear Mr. Gross:

Attached is a Statement designating Richard A. Brady, Esq., of Covington & Burling as Counsel for the Union Pacific Fund for Effective Government in this matter.

Sincerely yours,

W D Boone

W. D. Boone

cc: R. A. Brady, Esq.

345 Park Avenue New York, NY 10154

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Richard A. Brady, Esq.

ADDRESS: Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20044

TELEPHONE: (202) 622 - 6000

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 12, 1984
DATE

Charles L. Eaton
SIGNATURE
Charles L. Eaton
Manager
Union Pacific Fund for
Effective Government

RESPONDENT'S NAME: Union Pacific Fund for Effective Government

ADDRESS: c/o Union Pacific Corporation
345 Park Avenue - Suite 3100
New York, NY 10154

HOME PHONE:

BUSINESS PHONE: (212) 418 - 7777

8904074780

GCC#5646

STATEMENT OF RESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Mr. Miles Ambrose, Esq

ADDRESS: O'Connor & Hannan
1919 Pennsylvania Avenue, NW
Suite 800
Washington, DC 20006

TELEPHONE:

84 NOV 15 P4:

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 12, 1984
DATE

SIGNATURE
Jack Friou
Treasurer, American Family PAC

RESPONDENT'S NAME: Jack Friou

ADDRESS: P.O. BOX 1459
Columbus, GA 31999

HOME PHONE: (404) 327-1606

BUSINESS PHONE: (404) 323-3431

8900744781

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
FCC#5640
84 NOV 15 AM : 26

MUR 1837

NAME OF COUNSEL: John J. Gill

ADDRESS: American Bankers Association
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036

TELEPHONE: (202) 467-4240

84 NOV 15 PM 12: 32

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12/84
Date

Brian J. Meyer
Signature

RESPONDENT'S NAME: Brian Meyer

ADDRESS: American Bankers Aasociation
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036

HOME PHONE: (301) 949-3744

BUSINESS PHONE: (202) 467-5774

8204074978 2

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC

GCC#5632

84 NOV 15 A8:37

MUR 1837

NAME OF COUNSEL: Edward H. Forgotson

ADDRESS: Beveridge & Diamond, P.C.
1333 New Hampshire Ave., N.W.
Washington, D.C. 20036

TELEPHONE: 202-828-0255

84 NOV 15 A9:23

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov. 12, 1984
Date

Louis A. Beecherl, Jr.
Signature Louis A. Beecherl, Jr.

RESPONDENT'S NAME: Louis A. Beecherl, Jr.

ADDRESS: 2001 Bryan Tower, Suite 2750
Dallas, Texas 75201

(Note address change (from 3801 Beverly (Drive, Dallas, Texas (75205.

HOME PHONE: 214-521-0521

BUSINESS PHONE: 214-747-4116

8904074780

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC
GCC #5619
84 NOV 14 AM : 29

MUR 1837

NAME OF COUNSEL: Edward H. Forgotson

ADDRESS: Beveridge & Diamond, P.C.
1333 New Hampshire Ave., N.W.
Washington, D.C. 20036

TELEPHONE: 202-828-0255

84 NOV 14 P12:29
OFFICE OF GENERAL COUNSEL

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Nov. 12, 1984
Date

Louis A. Beecherl, Jr.
Signature Louis A. Beecherl, Jr.

RESPONDENT'S NAME: Louis A. Beecherl, Jr.

ADDRESS: 2001 Bryan Tower, Suite 2750
Dallas, Texas 75201

(Note address change (from 3801 Beverly (Drive, Dallas, Texas (75205.

HOME PHONE: 214-521-0521

BUSINESS PHONE: 214-747-4116

8904074784

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED BY THE FEC
(FEC #5787)
84 NOV 20 A8:44

MUR 1837

NAME OF COUNSEL: Jim Schoener

ADDRESS: Miller, Canfield, Paddock & Stone
Suite 1200 - 1015 15th St. NW.
Washington D.C. 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-9-84
Date

Eugene M. McElyea
Signature

RESPONDENT'S NAME: Eugene M. McElyea

ADDRESS: P.O. Box 1167
Crockett, Tx 75835

HOME PHONE: 409-544-7911

BUSINESS PHONE: 409-544-5716

8904074783

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Jim Schoener

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th St. NW - Suite 1200
Washington D.C., 20005

TELEPHONE: 202-789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-9-1984
Date

Carolyn D. McElyea
Signature

RESPONDENT'S NAME: Carolyn D. McElyea

ADDRESS: P.O. Box 1167
Crockett Tx 75835

HOME PHONE: 409-544-7911

BUSINESS PHONE: NONE

8204074785

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: Robert L. Schwarz

ADDRESS: Atlas & Hall
P. O. Drawer 3725
McAllen, Texas 78502

TELEPHONE: (512) 682-5501

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 9, 1984
Date

Frances J. Rogers
Signature

RESPONDENT'S NAME: Frances J Rogers

ADDRESS: Rt 1 Box 584
McAllen, Texas 78501

HOME PHONE: 512 682 0751

BUSINESS PHONE:

9904074787

STATEMENT OF DESIGNATION OF COUNSEL

GCC#5468
RECEIVED AT THE FEC
84 NOV 16 AM 11:43

MUR 1837

NAME OF COUNSEL: [redacted]

ADDRESS: [redacted]

[redacted]

[redacted]

James F. Schoener, Esq.
Miller, Canfield, Paddock & Stone
1015 15th Street, N.W.
Suite 1200
Washington, D. C. 20005

TELEPHONE: [redacted]

(202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9 November 1984
Date

Mrs. Helen Allen
Signature

RESPONDENT'S NAME: Mrs. Helen Allen

ADDRESS: 3207 Groveland Lane
Houston, Texas 77019

HOME PHONE: (713) 523-8119

BUSINESS PHONE: (713) 939-2201

84 NOV 16 P12:43

8904074788

RECEIVED AT THE FEC
GCC# 8147
85 JUL 29 P 1:

STATEMENT OF DESIGNATION OF CO-COUNSEL

MUR 1837

NAME OF COUNSEL: David N. Everett

ADDRESS: Maxwell, Godwin & Carlton
1200 Diamond Shamrock Tower
717 North Harwood Street
Dallas, TX 75201

85 JUL 29 P 3:06

TELEPHONE NO.: 214/742-4422

The above-named individual is hereby designated as our co-counsel and is authorized to receive any notifications and other communications from the Commission and to act on our behalf before the Commission.

FRIENDS OF PHIL GRAMM

July 25, 1985
Date

By John Baxter
John Baxter

RESPONDENT'S NAME: John Baxter, Treasurer

ADDRESS: Friends of Phil Gramm
Suite 203, 2555 Stemmons Freeway
Dallas, TX 75207

NE:

214/638-9530

STATEMENT OF DESIGNATION OF CO-COUNSEL

MUR 1837

NAME OF COUNSEL: Edward J. Drake

ADDRESS: Vinyar, Drake & Miller
1820 Lincoln Plaza
500 N. Akard
Dallas, TX 75201

TELEPHONE NO.: 214/720-2222

The above-named individual is hereby designated as our co-counsel and is authorized to receive any notifications and other communications from the Commission and to act on our behalf before the Commission.

FRIENDS OF PHIL GRAMM

July 25, 1985
Date

By John Baxter
John Baxter

RESPONDENT'S NAME: John Baxter, Treasurer

ADDRESS: Friends of Phil Gramm
Suite 203
2555 Stemmons Freeway
Dallas, TX 75207

HOME PHONE:

BUSINESS PHONE: 214/638-9530

39004074790

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: RICE M. Tilley, Jr.

ADDRESS: Texas American Bank Bldg.
Fort Worth, TX 76102

TELEPHONE: (817) 335-7373

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/26/81
Date

Signature

RESPONDENT'S NAME: R. R. LOWDON

ADDRESS: 2727 W. 7th St.
Fort Worth, TX 76107

HOME PHONE: (817) 732-3622

BUSINESS PHONE: (817(870-9000

8904074479 1

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
HAND DELIVERED
84 NOV 15 P4:

MUR 1837

NAME OF COUNSEL: William H. Schweitzer

ADDRESS: Jan W. Baran
Baker & Hostetler

818 Connecticut Avenue, N. W.

Washington, D. C. 20006

TELEPHONE: 202/861-1500

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 15, 1984
Date

John Kinas
Signature
John Kinas
Special Assistant to Staff Vice President for Political Affairs
National Association of Home Builders BUILD Political Action Committee

RESPONDENT'S NAME: National Association of Home Builders BUILD Political Action Committee

ADDRESS: 15th & M Streets, N. W.

Washington, D. C. 20005

HOME PHONE:

BUSINESS PHONE: 202/822-0400

2004079

MCM 6648

ROBERT P. GRIFFIN *
CLEVELAND THURBER
JAMES F. SCHOENER *
WILLIAM G. BUTLER
FITCH R. WILLIAMS
MICHAEL J. HODGE
COUNSEL

EMMETT E. EAGAN
CONSULTING PARTNER

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1862-1945)

JOHN A. GILRAY, JR., P.C.
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ALLEN SCHWARTZ
JOHN W. GELDER, P.C. *
GEORGE E. PARKER III **
RICHARD A. JONES, P.C.
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GEORGE F. deCLAIRE *
ROBERT S. KETCHUM, P.C.
SAMUEL J. McKIM III, P.C.
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CYNTHIA B. FAULHABER

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THOMAS F. CAVALIER
GERARD McGUIRE
JOHN J. AYAUB
JAMES D. ROBB
CLAUDIA J. ROBERTS
LINDA G. SKLAREN

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
* ALSO ADMITTED IN FLORIDA

05 FEB 11 P1:27

February 8, 1985

Patty Reilly, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

RE: MUR 1837

Dear Ms. Reilly:

Enclosed please find the Designation of Counsel form for Mr. Weldon H. Smith of Houston, Texas. I ask that the response heretofore made on behalf of the individual respondents be amended to include Mr. Smith.

Thank you.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener

JFS/cb
Enclosure

Rec'd 12-07-84
GCH#6875
MUR1837

3011 North Main Street
Victoria, Texas 77901
November 29, 1984

to F.E.C.

James F. Schoener, Esq.
Miller, Canfield, Paddock & Stone
1015 15th Street NW, Suite 1200
Washington, DC 20005

Dear Mr. Schoener:

In reference to your letter dated November 9, 1984, this is to advise that neither Mr. Alkek nor I have received any correspondence from the Federal Election Commission. Of course, if either or both of us should become involved, we would like to have you represent us.

Please keep me informed of your progress. I would appreciate having any future correspondence directed to me at 1300 Main Street, Suite 501, Houston, Texas 77002. I may be reached by telephone at (713) 658-8780.

Please acknowledge receipt of this letter by signing one copy and returning it to me in the enclosed, self-addressed envelope.

Yours very truly,

Margaret Alkek

(Mrs.) Margaret Alkek

RECEIVED THIS 5th DAY
OF December, 1984.

James F. Schoener (cb.

Federal Election Com. letter + etc was mailed by Mrs Alkek, under the name of Margaret Allen - 12/17/84 - we will send to you the entire file when we are back in the office after the holidays

8200474794

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, N.W., Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Feb. 4, 1985
Date

Weldon H. Smith
Signature Weldon H. Smith

RESPONDENT'S NAME: Weldon H. Smith

ADDRESS: Suite 666
7500 San Felipe
Houston, TX 77063

HOME PHONE:

BUSINESS PHONE: 713/783-2300

8907447793

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: David A. Schwarte

ADDRESS: American Airlines, Inc.
Mail Drop 4C14
P.O. Box 619616
Dallas/Fort Worth Airport, Texas 75261-9616

TELEPHONE: (817) 355-1266

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 19, 1984
Date

Gene E. Overbeck
Signature

RESPONDENT'S NAME: Gene E. Overbeck

ADDRESS: American Airlines, Inc.
1101 17th Street, N.W.
Washington, D.C. 20036

HOME PHONE: (202) 337-1156

BUSINESS PHONE: (202) 857-4221

9004074790

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock & Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-22-84
Date

Robert S Folsom
Signature

RESPONDENT'S NAME: Robert S. Folsom

ADDRESS: 16475 Dallas Parkway, Suite 800
Dallas, Texas 75248

HOME PHONE: 214 - 931-7400

BUSINESS PHONE: 214 931-7400

8004074797

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: James F Schoener, Esq.

ADDRESS: Miller, Canfield Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

November 22, 1984
Date

Mrs. Margaret D. Folsom
Signature

RESPONDENT'S NAME: MARGARET FOLSOM

ADDRESS: 16475 Dallas Parkway, Suite 800
Dallas, Texas 75248

HOME PHONE: 214 - 931-7400

BUSINESS PHONE: 214 - 931-7400

8004079798

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1837

NAME OF COUNSEL: John J. Gill

ADDRESS: American Bankers Association
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036

TELEPHONE: (202) 467-4240

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12/84
Date

Brian J. Meyer
Signature

RESPONDENT'S NAME: Brian Meyer

ADDRESS: American Bankers Aasociation
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036

HOME PHONE: (301) 949-3744

BUSINESS PHONE: (202) 467-5774

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GCC#6387
85 JAN 14 A9:3

ROBERT P. GRIFFIN *
CLEVELAND THURBER
JAMES F. SCHOENER *
WILLIAM G. BUTLER
FITCH R. WILLIAMS
MICHAEL J. HODGE
COUNSEL

EMMETT E. EAGAN
CONSULTING PARTNER

LAW OFFICES OF
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A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
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1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

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KAREN A. McCOY
THOMAS F. CAVALIER
GERARD McGUIRE
JOHN J. AYAUB
JAMES D. ROBB
CLAUDIA J. ROBERTS
LINDA G. SKLAREN

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
* ALSO ADMITTED IN FLORIDA

January 8, 1984

MUR 1837
Reilly

Patty Reilly, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1837

Dear Ms. Reilly:

Enclosed please find the Designation of Counsel form for Mrs. Margaret Alkek. I believe an original was sent directly to you, but in case it was not received, I enclose this additional copy.

I ask that the response heretofore made on behalf of the individual respondents be amended to include Mrs. Alkek. Her contributions were $1,000 to the primary and $1,000 to the general election.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener

JFS/cb
Enclosure

RECEIVED AT THE FEC
GCC#6325
85 JAN 7 P4:38

3011 North Main Street
Victoria, Texas 77901
January 4, 1985

AM:58

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

Attention: Patty Reilly

Re: MUR 1837

Gentlemen:

I have received your letter dated November 1, 1984. This letter was accepted by Mr. Alkek's secretary and forwarded to me at Bandera, Texas. I did not actually receive your letter until December 17, 1984, and cannot explain the delay.

As requested, I am enclosing a statement of designation of counsel, authorizing James F. Schoener, Esq., to act on my behalf in this matter. I am also enclosing a copy of my letter to Mr. Schoener, dated November 29, 1984.

Please direct all future communications to Mr. Schoener and, if you need to contact me personally, you may write to me at 1300 Main Street, Suite 501, Houston, Texas 77002.

Very truly yours,

Margaret Alkek

(Mrs.) Margaret Alkek

A/f

8704744801

STATEMENT OF DESIGNATION OF COUNSEL

MUR MUR 1837

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: Miller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

TELEPHONE: (202) 789-8640

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

December 21, 1984
Date

Mrs Margaret Alkek
Signature

RESPONDENT'S NAME: Mrs. Margaret Alkek

ADDRESS: 3011 N. Main
Victoria, Texas 77901

HOME PHONE: (512) 573-9124

BUSINESS PHONE: (713) 658-8998

8004074902

3011 North Main Street
Victoria, Texas 77901
November 29, 1984

James F. Schoener, Esq.
Miller, Canfield, Paddock & Stone
1015 15th Street NW, Suite 1200
Washington, DC 20005

Dear Mr. Schoener:

In reference to your letter dated November 9, 1984, this is to advise that neither Mr. Alkek nor I have received any correspondence from the Federal Election Commission. Of course, if either or both of us should become involved, we would like to have you represent us.

Please keep me informed of your progress. I would appreciate having any future correspondence directed to me at 1300 Main Street, Suite 501, Houston, Texas 77002. I may be reached by telephone at (713) 658-8780.

Please acknowledge receipt of this letter by signing one copy and returning it to me in the enclosed, self-addressed envelope.

Yours very truly,

Margaret Alkek

(Mrs.) Margaret Alkek

RECEIVED THIS _____ DAY
OF _____, 1984.

_____

9004074806

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ANNEX C TO THE PUBLIC RECORD FILE IN MUR 1837

(SEE NOTE AT FIRST PAGE OF THE MICROFILM FILE)

C

8904074480 4

HUGH HALFF, JR.
3333 CHERRY RIDGE DRIVE, #201
POST OFFICE BOX 466
SAN ANTONIO, TEXAS 78201
512/341-5445

RECEIVED FEC
GCC#5584
84 NOV 13 P12:26

84 NOV 13 P1:27

November 8, 1984

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1837

Dear Mr. Gross:

I have received your letter of November 1, 1984 with attachments, which I received on November 8, 1984. There apparently is some question concerning contributions to the campaign of Phil Gramm.

Please be advised that contributions to that campaign were made on June 26, 1984 in the amounts of $1000 for myself and $1000 for my wife, Mrs. Marie Halff. To substantiate this, I have enclosed a copy of the check stub reflecting the disbursement. In addition, I've enclosed a signed affidavit from myself and Mrs. Halff attesting to these facts.

I hope that this clarifies the matter to your satisfaction.

Very truly yours,

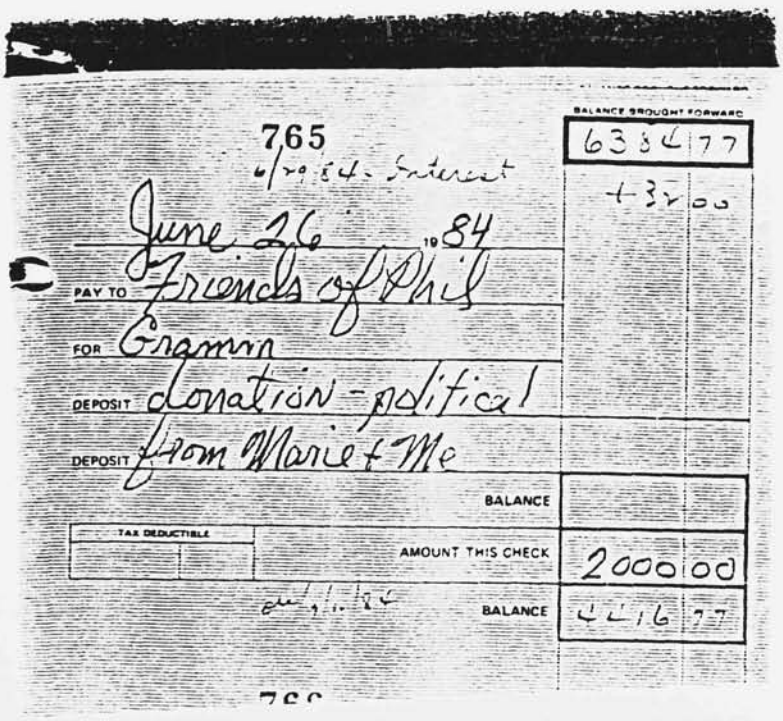
Hugh Halff, Jr.

Hugh Halff, Jr.

HH:tl

Enclosures:
Copy of Check Stub
Affidavits

8904074480 5



765

6/29/84 - Interest

June 26 1984

PAY TO Friends of Phil

FOR Gramm

DEPOSIT donation - political

DEPOSIT from Marie + Me

BALANCE BROUGHT FORWARD	6384 77
	+32 00
BALANCE	
AMOUNT THIS CHECK	2000 00
BALANCE	4416 77

TAX DEDUCTIBLE

[illegible]

766

8904074480 5

765

6/29/84 - Interest

June 26 1984

PAY TO Friends of Phil

FOR Gramm

DEPOSIT donation - politic

DEPOSIT from Marie + Me

TAX DEDUCTIBLE

AMOUNT THIS

766

8 9 0 4 0 7 4 4 8 0 7

AFFIDAVIT

We, Hugh Halff, Jr. and Marie Halff, hereby certify that the payment made on June 26, 1984 to Friends of Phil Gramm in the amount of $2,000, represented a contribution of $1000 from Hugh Halff, Jr. and a contribution of $1000 from Marie Halff.

Hugh Halff, Jr.

Marie Halff

The State of Texas)
)
County of Bexar)

Before me, the undersigned authority, on this day personally appeared HUGH HALFF, JR. and MARIE HALFF, individuals, known to me to be the persons whose names are subscribed to the foregoing instrument, and having been by me first duly sworn, declared that all statements therein are true.

Given under my hand and seal of office on the 8th day of November, 1984.

Beverly A. Boyd
Notary Public, State of Texas

My commission expires:
3-28-87

BEVERLY A. BOYD
Notary Public, State of Texas
My Commission Expires 3-28-87

8607468

W. C. OR KAREN EDWARDS
HOUSEHOLD ACCOUNT
LIC. 6782665
P. O. BOX 2431 PH. 915-398-5483
BIG SPRING, TX 79720

PB

493

8-14 19 84

88-237
1113

PAY TO THE ORDER OF Presidential Prom Breakfast Ball $ 3000.00

Three Thousand & 00/100 DOLLARS

THE STATE NATIONAL BANK
OF BIG SPRING
BIG SPRING, TEXAS

MEMO 2-tickets

Karen Edwards

⑆111302370⑆ ⑈241 289 6⑈ 0493 ⑈0003000000⑈

PHIL
GRAMM
U.S. SENATE TEXAS

August 17, 1984

W. C. Edwards
P. O. Box 2431
Big Spring, Tx. 79720

Dear Mr. Edwards,

Thank you for your commitment to purchase 2 tickets for the Presidential Nomination Breakfast Ball on Thursday, August 23, 1984, at the Dallas Hyatt Regency.

I have taken the liberty of enclosing a fact sheet with important details of the event.

With Texas as one of the key states for the Republican Party, it is critical that we raise campaign funds as early as possible. Your active support will enable us to accomplish our goal.

Your support is greatly appreciated.

Sincerely,

Brad O'Leary

Brad O'Leary

Enclosure

Paid for by friends of Phil Gramm

8904074481O

PHIL

GRAMM

U.S. SENATE TEXAS

PRESIDENTIAL NOMINATION BREAKFAST BALL

CO-CHAIRMAN FACT SHEET

On Thursday, August 23, 1984, immediately after the Convention, a Celebrity Salute is to take place, with Wayne Newton and Charlton Heston performing for guests at the Presidential Nomination Breakfast Ball to be held at the Dallas Hyatt Regency from 9:00 pm to 2:00 am.

Special Television screens will be set in the ballroom to insure complete coverage of the President's nomination speech.

As a Co-Chairman of the Breakfast Ball you will have the responsibility to buy or sell 4 to 8 tickets. Anyone who sells 8 tickets will have a Senator, Congressman, Cabinet Official, Governor or show business celebrity assigned to their table on a first come basis.

Table prices are $12,000 for a table of eight. Individual tickets may be purchased for $1,500.

Checks should be made payable to: Presidential Nomination Breakfast Ball

The checks should be sent to: Presidential Nomination Breakfast Ball
c/o Congressman Phil Gramm
P.O. Box 10108
Dallas, Texas 75207

NOTE: ↓

The largest contribution that one person may make is $20,000.

No corporate money can be accepted.

Political Action Committees may contribute or pledge $25,000 as the maximum allowable under the law.

If you have any questions or need additional information, please call Donna Henderson or Brad O'Leary at (214) 638-1927.

8907407448111

RECEIVED BY THE FEC
GCL#5590
84 NOV 13 A10:17

WILLIAM A. CUSTARD
MEADOWS BUILDING
DALLAS, TEXAS 75206

November 8, 1984

(214) 369-2766

84 NOV 13 P1:25

Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR 1837

Dear Sir:

In response to your letter of November 1, 1984, I wish to state that no violation has occurred as alleged.

Some confusion has arisen as to my donation and that of my son. The only donation I made and the only donation my son made are as follows:

Donor	Date	Check No.	Amount
William A. Custard	8-20-84	11341	$1,000.00
W. Allen Custard, III	8-20-84	112	1,000.00

I have enclosed xerox copies of these checks. In reviewing the alleged violation, it appears that the above donations were erroneously both recorded in the name of W. Allen Custard rather than as above actually donated. We both have the same address of 3703 Crescent Avenue, Dallas, Texas 75205, which may have led to some of the confusion.

For your information, my son is 22 years of age and is financially independent. He is presently in France, or I would have him join me in signing this response.

Yours very truly,

William A. Custard

WAC/ga
Enclosure

8004074817

W. ALLEN CUSTARD, III
PHONE 526-2486
3703 CRESCENT AVENUE
DALLAS, TEXAS 75205

MercantileBank
Mercantile National Bank at Dallas
Dallas, Texas

112

August 20 19 84 32-61/1110

PAY TO THE ORDER OF - - - Friends of Phil Gramm - - - - - - - - - - - - - - - $ 1,000.00

- - - - One thousand and 00/100 - DOLLARS

	Contribution	1,000.	00

Wm Allen Custard III

⑈000112⑈ ⑆111000614⑆ 0406000358⑈ ⑈0000100000⑈

CLARKE CHECKS

8 9 9 4 0 7 4 4 8 1 3

WILLIAM A. CUSTARD

MercantileBank
Mercantile National Bank at Dallas
Dallas, Texas

11341

August 20 19 84 32-61/1110

PAY TO THE ORDER OF - - - - FRIENDS OF PHIL GRAMM - - - - - - - - - - - - - - $ 1,000.00

- - - - - - - - ONE THOUSAND AND NO/100 - - - - - - - - - - - - - - - - - - - DOLLARS

	Contribution	1,000.	00

WILLIAM A. CUSTARD

⑈011341⑈ ⑆111000614⑆ 0208830218⑈ ⑈0000100000⑈

CLARKE CHECKS

RECEIVED AT THE FEC
OCC #5591
84 NOV 13 A10:17

John H. White
Post Office Box 16309
San Antonio, Texas 78216

November 9, 1984

84 NOV 13 P1:25

Federal Election Commission
Washington, D. C. 20463

RE: MUR 1837

Dear Sir:

With regard to the enclosures sent me via Registered Mail in this case.

I know nothing of any violations. I do acknowledge that on June 26, 1984 I mailed a contribution to "Friends of Phil Gramm" as a $1,000 donation each for my wife and myself. This is from community property and records clearly reflect such. It has been my understanding that a $1,000 contribution per person is okay.

I usually specify with a clipped on attachment that the check is from Mrs. White and myself. I assume it was done in this case and the attachment could have gotten separated in the paper work.

Thank you and hoping this resolves the question.

Sincerely,

John H. White

John H. White

JHW/jem

8 9 0 4 0 7 4 4 8 1 4

RECEIVED AT THE FEC
GC.C#5587
84 NOV 13 A10:30

November 9, 1984

84 NOV 13 P1:2
GENERAL COUNSEL

FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

Gentlemen:

Upon receipt, today, November 9, of a notice of complaint numbered MUR 1837 concerning campaign contributions to Mr. Phil Gramm running for Senate from the State of Texas, my wife and I have contributed a total of $4,000.00 to Mr. Phil Gramm for his election campaign. We have been told in the past that we could give up to $2,000.00, individually, to any individual running for the Senate of the United States. These contributions were made throughout the year, starting in December 1983 through 1984. On November 2, I personally contacted the Phil Gramm re-election campaign headquarters, and had them re-verify the correctness of our various contributions for the last year. Their records did reflect a total of $4,000.00 contributed by me and my wife for Phil Gramm's re-election.

It is in my opinion that the complaint registered by Miss Donna Mobley was a continuation of the mud and smut tactics used throughout this campaign. This prohibited both candidates from addressing the facts and spending the majority of their time defending each other's countercharges from one item or the other.

Please contact me if I can be of further assistance in clearing up this unfounded complaint.

Respectfully yours,

L D Burns

L. D. Burns

LDB:gms

3 9 0 4 0 7 4 4 8 1 3

RECEIVED AT THE FEC
GCC#5588
84 NOV 13 A10:29

DENMAN, FRANKLIN & DENMAN
LAWYERS
SUITE 535
SAN ANTONIO BANK & TRUST BUILDING
711 NAVARRO STREET
SAN ANTONIO, TEXAS 78205

LEROY G. DENMAN, JR.
GILBERT M. DENMAN, JR.

CABLE ADDRESS
"DENMAN" SAN ANTONIO
(512) 224-1011

November 9, 1984

84 NOV 13 P1:25
GENERAL COUNSEL

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

Attention: Patty Reilly
Re: MUR 1837

Dear Sirs:

I have your letter of November 1, 1984 informing me that someone named Donna Mobley has filed a complaint against me and hundreds of others.

This complaint insofar as it states that I contributed $2,000.00 to the Phil Gramm campaign is entirely untruthful. I made no gift to Phil Gramm in the primary. On the contrary, I opposed him in the primary by contributing to my favorite candidate, Robert Krueger, who was running on the Democratic ticket. After Krueger was defeated, I made one $1,000.00 contribution to Friends of Phil Gramm by check dated June 26, 1984, of which I enclose a copy. That was the only contribution I have ever made to Gramm. The endorsement on that check specifically recognizes it was for the General Election. It appears to me from the complaint that the complainant has merely recorded this one contribution twice.

Yours very truly,

Gilbert M. Denman Jr.

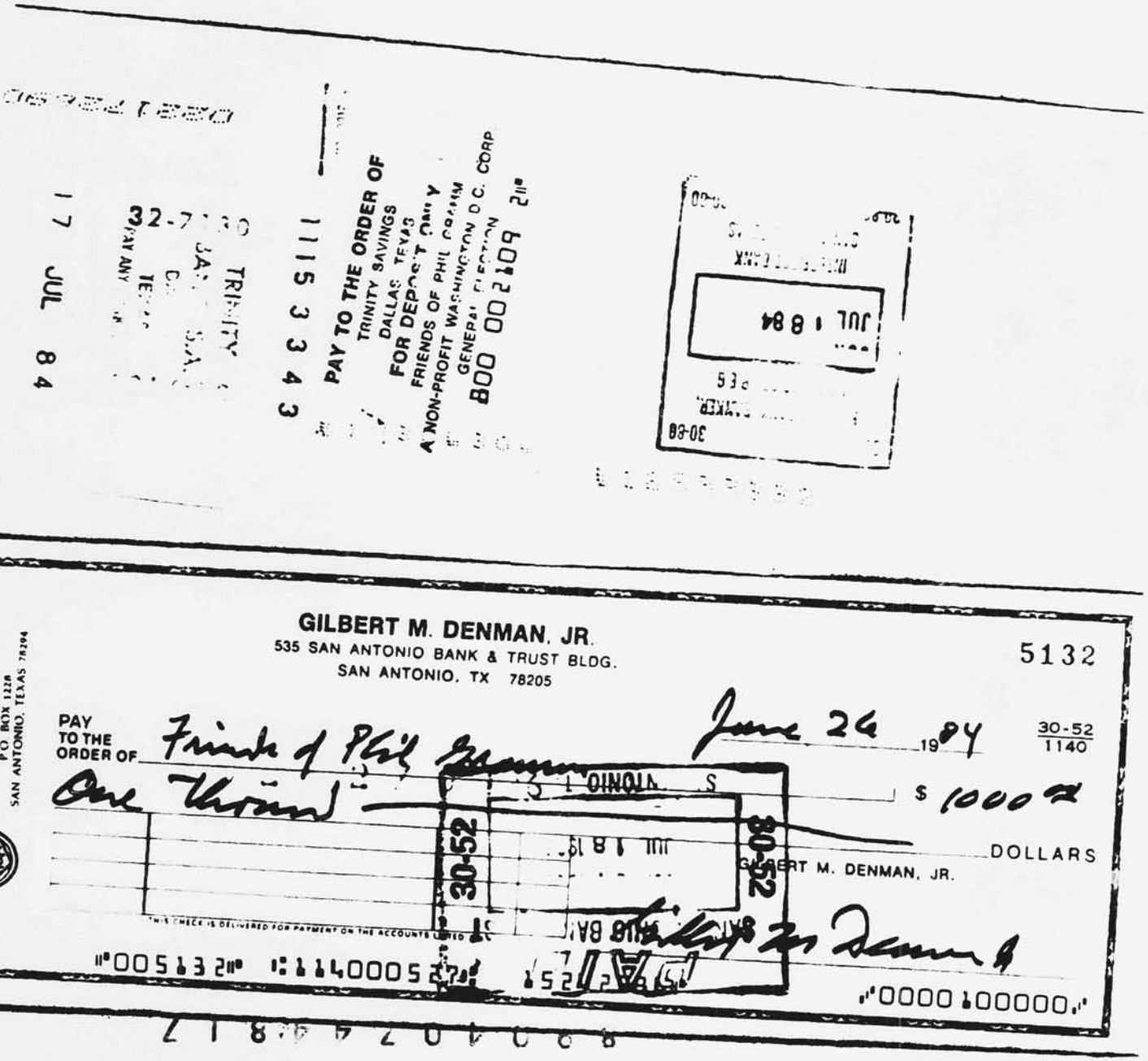
gmd jr-ma

SWORN TO AND SUBSCRIBED before me by Gilbert M. Denman, Jr. on this 9th day of November, 1984.

Marine O. Albrecht
Notary Public

My Commission expires 6/30/88

3 9 0 4 0 7 4 4 8 1 5



17 JUL 84

32-7130

TRINITY

1115 3 3 4 3

PAY TO THE ORDER OF
TRINITY SAVINGS
DALLAS, TEXAS
FOR DEPOSIT ONLY
FRIENDS OF PHIL GRAMM
A NON-PROFIT WASHINGTON D.C. CORP
GENERAL ELECTION
800 002109 2

JUL 18 84

30-52

San Antonio Bank & Trust
P.O. BOX 1228
SAN ANTONIO, TEXAS 78294

GILBERT M. DENMAN, JR.
535 SAN ANTONIO BANK & TRUST BLDG.
SAN ANTONIO, TX 78205

5132

PAY TO THE ORDER OF Friends of Phil Gramm June 26 1984 30-52/1140

One Thousand $ 1000 DOLLARS

GILBERT M. DENMAN, JR.

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

30-52

JUL 18 19

⑈005132⑈ ⑆114000527⑆ 152 2 8 ⑈0000100000⑈

8 0 0 4 0 7 4 4 8 1 7

THE SEELIGSONS
1604 NATIONAL BANK OF COMMERCE BUILDING
SAN ANTONIO, TEXAS 78205

RECEIVED BY THE FEC
GCC#5676
84 NOV 19 A10:07

November 12, 1984

84 NOV 19 A11:46

Federal Election Commission
1325 K Street, N.W.
Washington, DC 20433

Re: MUR 1837

Gentlemen:

Enclosed find a copy of my check #548 in the amount of $1,000.00 made payable to "Friends of Phil Gramm." This was my only contribution made to the Phil Gramm Campaign. As you can see, the check was endorsed to the General Election Campaign Fund. I have made no other contribution either directly or indirectly to Phil Gramm.

Your truly,

Arthur Seeligson, III

ch:gaj

enc

8004074818

ARTHUR SEELIGSON, III
SPECIAL
1604 NBC BLDG. 227-3474
SAN ANTONIO, TEXAS 78205

National Bank of Commerce
of San Antonio
P.O. Drawer 124 — San Antonio, Texas 78291

548

7/3 19 84
304921181

PAY TO THE ORDER OF Friends of Phil Gramm $ 1,000.00

REPAYMENT $100 DOLLARS

	Contribution		

ARTHUR SEELIGSON, III
SPECIAL

⑈000548⑈ ⑆114000116⑆ ⑈1 630 024⑈ ⑈0000100000⑈

CLARKE CHECKS

8 9 0 4 0 7 4 4 8 1 9

32-7130
07-18-84 090 ... 304921181
17 JUL 84
TRINITY BANK, S.A.
DALLAS TEXAS
PAY ANY BANK, P.E.
32-7130

PAY TO THE ORDER OF
FRIENDS OF PHIL GRAMM
FOR DEPOSIT ONLY
A NON-PROFIT WASHINGTON D.C. CORP.
GENERAL ELECTION
800 002109

32-1 JY '84 18 32-1
PAY ANY BANK P.E.
INTERFIRST BANK
DALLAS, N.A.

30-80 30-80
PAY ANY BANK, BANKER,
OR TRUST CO., P.E.G.
JUL 1 84
INTERFIRST BANK
SAN ANTONIO TEXAS
30-80 30-80

RECEIVED AT THE FEC
GCC# 5633
84 NOV 15 A 8:33

ATLAS & HALL
ATTORNEYS AT LAW
PROFESSIONAL ARTS BUILDING • 818-820 PECAN
McALLEN, TEXAS 78502
(512) 682-5501

MAILING ADDRESS
P. O. DRAWER 3725

MORRIS ATLAS
ROBERT L. SCHWARZ
GARY GURWITZ
E. G. HALL
TRAVIS HIESTER
CHARLES C. MURRAY
DAVID H. HOCKEMA
A. KIRBY CAVIN
MIKE MILLS
M. O. (MICK) SAWYER
BALLARD BENNETT
THOMAS O. MATLOCK, JR
MOLLY MATLOCK
CHARLES W. HURY
VICKI M. SKAGGS
LISA POWELL
STEPHEN L. CRAIN
SUZANNE R. SCOTT
F. G. HINOJOSA, JR
JOSE E. GARCIA
RONALD G. HOLE

ASA V. BLAND (1933-1977)
C. Y. MILLS (1916-1982)

OF COUNSEL
HARRY L. HALL
L. C. McLEAN

November 12, 1984

84 NOV 15 A 9:23

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1837; Complaint of Violations of Federal Election Code

Dear Mr. Gross:

Enclosed please find Mrs. Frances J. Rogers' sworn statement concerning the allegations contained in your letter of November 1, 1984. Please advise if any additional information is desired or needed.

I look forward to hearing from you in the near future.

Very truly yours,

ATLAS & HALL

By: Robert L. Schwarz

RLS:sr
enclosures

STATE OF TEXAS §
§
COUNTY OF HIDALGO §

AFFIDAVIT

BEFORE ME, a notary public, in and for the State of Texas, appeared FRANCES J. ROGERS, personally known to me, and, after having been duly sworn, upon her oath deposed and stated as follows:

"My name is FRANCES J. ROGERS and I currently reside in McAllen, Texas. I sometimes use the nickname "Nita". My mailing address is Route 1, Box 584, McAllen, Texas 78501. My husband's business address is P. O. Box 1077, Edinburg, Texas 78539.

"I have never contributed any money to the Phil Gramm primary election, the Phil Gramm general election, nor to the candidate Phil Gramm in any way, during any part of 1984. I am at a loss to explain why I have been credited with any contributions."

Frances J. Rogers
FRANCES J. ROGERS

SUBSCRIBED AND SWORN TO before me by FRANCES J. ROGERS on this the 12th day of November, 1984, to certify which, witness my hand and seal of office.

Ruth Williamson
Notary Public in and for
Hidalgo County, Texas

My Commission Expires: 5-31-85

RUTH WILLIAMSON, Notary Public
In and for the State of Texas

8904074482 1

RECEIVED AT THE FEC
GCC #5693
84 NOV 19 A8:44

ALBERT B. FAY, JR.
515 HOUSTON AVENUE
HOUSTON, TEXAS 77007

November 12, 1984

84 NOV 19 A11:47

Mr. Kenneth A. Gross
Federal Election Commission
Washington, D. C. 20463

Dear Mr. Gross:

I had no idea I had violated any laws when I made my contribution to Friends Of Phill Gramm. I do not believe $300 was an unreasonable amount.

I am enclosing a copy of my check. I would be interested to know how I have violated the law.

Sincerely,

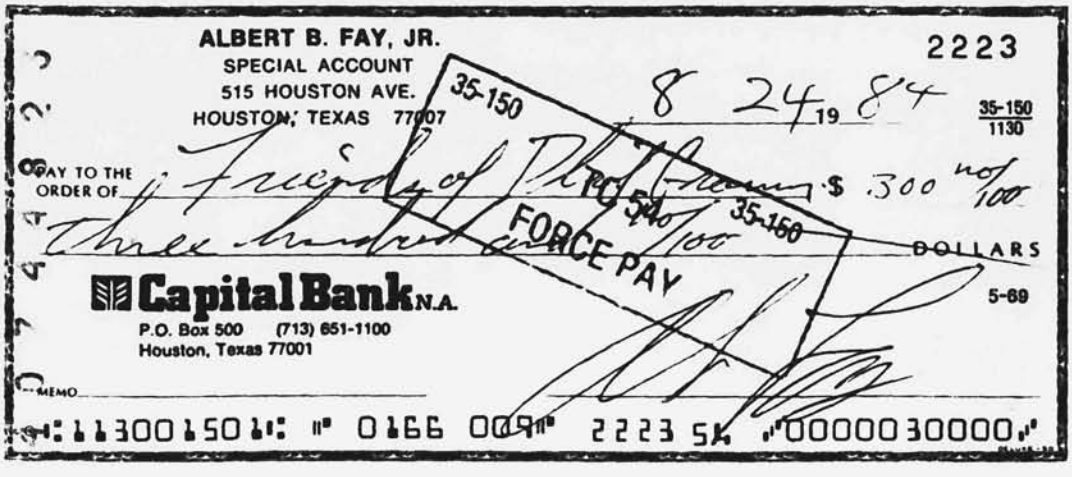
Albert B. Fay, Jr.

ABF:mja

Enclosure

P. S. Please be advised that my address is 5719 Indian Trail, Houston, Texas 77057.

8 9 0 4 0 7 4 4 8 2 2



ALBERT B. FAY, JR.
SPECIAL ACCOUNT
515 HOUSTON AVE.
HOUSTON, TEXAS 77007

2223

35-150

8 24 19 84

35-150
1130

PAY TO THE ORDER OF Friends of Phil Gramm $ 300 no/100

Three hundred and no/100 DOLLARS

35-150

FORCE PAY

Capital Bank N.A.
P.O. Box 500 (713) 651-1100
Houston, Texas 77001

5-69

MEMO

⑆113001501⑆ ⑈ 0166 009⑈ 2223 5⑆ ⑈0000030000⑈

RECEIVED AT THE FEC
GCC#5652
84 NOV 16 A9:21

TEXAS ART GALLERY

November 12, 1984

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
84 NOV 16 A10:38

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D. C. 10463

Dear Mr. Steele,

This will acknowledge receipt of your letter of November 1 with complaint in regard to Phil Gramm campaign contributions.

If you will check my contribution, my check for $2,000 was dated June 30. On June 29 I was married here in Dallas and the contribution represented $1,000 from me and $1,000 from my wife. We left later that day on a three week wedding trip and I respectfully submit that I was not notified of nor had any inkling of anything being out of order. It was and is my understanding that $1,000 per individual is totally acceptable.

If there is anything further I can do for you, please do not hesitate to contact me.

Very truly yours,

William E Burford

William E. Burford
President

WEB/cb

8 9 0 4 0 7 4 4 8 2 4

Texas Art Gallery • 1400 Main Street • Dallas, Texas 75202 • (214) 747-8158

DAY 364-3400 – SINTON PHONE 884-4682 – CORPUS CHRISTI NIGHT 364-1336 – SINTON

RECEIVED AT THE FEC
84 NOV 15 A 8:26
GCG#5635

H. & K. Construction Company
PIPELINE CONSTRUCTION
POST OFFICE DRAWER 370
Sinton, Texas 78387-0370

November 13, 1984

MUR 1837
84 NOV 15 A 9:23
GENERAL COUNSEL'S OFFICE

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

Gentlemen:

Please be advised that the information forwarded me in your correspondence of November 1st, 1984, Violations Exceeding $1,000.00 to the Phil Gramm campaign fund, page "K" is in error.

The $1,000.00 contribution under date of Sept. 4 is correct. I did not make any other contributions.

I ask that you review your source of information and notify me when the correction is made.

Joan Kunitz

Mrs. Joan Kunitz
P. O. Box 1053
Sinton, Texas 78387

Subscribed and sworn to before me this 13th day of November, 1984.

Notary Public Estelle Hill

State of Texas Date Commission Expires 12/23/84

Notary Public
San Patricio County
State of Texas
My Commission Expires 12/23/84

8904007448825

RECEIVED AT THE FEC
GCC #S1,837
84 NOV 15 A8:29

LAW OFFICES
BEVERIDGE & DIAMOND, P. C.
1333 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20036

(202) 828-0200
TELECOPIER(202)828-0234
WRITER'S DIRECT DIAL NUMBER

BEVERIDGE & DIAMOND
SUITE 2506
101 PARK AVENUE
NEW YORK, N. Y. 10178
(212) 557-3355

JIM J. TOZZI
CONSULTING ECONOMIST

HENRY L. DIAMOND
ALBERT J. BEVERIDGE, III
GARY H. BAISE
HAROLD HIMMELMAN
CHRISTOPHER H. BUCKLEY, JR.
EDWARD H. FORGOTSON
J. MARSHALL COLEMAN
STEPHEN L. GORDON
JONATHAN Z. CANNON
ALEXANDER W. SIERCK
JOHN N. HANSON
ANDREW E. MISHKIN
GAINES GWATHMEY, III
CYNTHIA A. LEWIS
KARL S. BOURDEAU
JOHN S. GUTTMANN
STEPHEN R. MELTON
DON G. SCROGGIN
AMY L. EDWARDS
ROBERT BRAGER
JOHN R. ELDRIDGE
RICHARD S. DAVIS
THOMAS RICHICHI
CHRISTINA T. SIMMONS
DEAN H. CANNON
VIRGINIA S. ALBRECHT
PAUL E. SHORB, III
ELISABETH A. ROBINSON

CARL EARDLEY
OF COUNSEL

(202) 828-0281

November 13, 1984

84 NOV 15 A8:23

Ms. Patty Reilly
Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1837

Dear Ms. Reilly:

This law firm represents Mr. Louis Beecherl, Jr. and Mmes. Anne and Paige Pickens, three individuals who received notices from the Federal Election Commission ("FEC") about a complaint filed against Senator-elect Phil Gramm and others by Ms. Donna Mobley. While our clients are neither named in the complaint nor charged therein with any wrongdoing, they apparently have been notified about the Matter Under Review because their names appear in one of the exhibits.

According to the notice, our clients have 15 days from its receipt "to respond to the allegations made against [them]." No allegations were made against any of our clients, however. Based upon my conversation with you this date, we understand that FEC wants to know the circumstances under which our clients contributed to Senator-elect Gramm's campaign. Based upon my conversation with you today, we also understand that the FEC would like this information in the form of an affidavit.

We will provide FEC with affidavits from our three clients as soon as possible, and no later than December 5, 1984, and hereby request an extension of time until that date. Such an extension is necessary to properly prepare and execute the affidavits and serve them upon FEC.

3 9 0 4 0 7 4 4 8 2 5

Your attention to this matter is greatly appreciated.

Cordially,

Robert Brager

RB/bjd

8904074408227

GCC#5639

AMERICAN BANKERS ASSOCIATION
1120 Connecticut Avenue, N.W.
Washington, D.C.
20036

RECEIVED AT THE FEC
84 NOV 15 AM : 30

GENERAL COUNSEL
John J. Gill
202/467-4240

BY CERTIFIED MAIL

84 NOV 15 P12:31

November 13, 1984

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1837

Dear Mr. Gross:

This is in response to the complaint received by the American Bankers Association BankPac on November 7, 1984. The complaint alleges that BankPac violated the contribution limitations of the federal election laws and in particular 11 C.F.R. §110.2. Section 110.2 prohibits contributions by a multicandidate committee to a candidate in excess of $5,000 "with respect to any election." An election is any one of several processes by which an individual seeks election to federal office including: primary elections, run-offs, conventions, a party caucus, and a general election (2 U.S.C. §431(1)(A)-(D)).

The American Bankers Association's multicandidate committee, BankPac, respectfully submits that there has been no violation of the federal election laws by this committee.

The contribution in question ($10,000 to the Friends of Phil Gramm) was disbursed to the campaign for both the primary and the general election. The contribution (Check #2008, enclosed) clearly indicated $5,000 for the Primary Debt and $5,000 for the General Election. BankPac made the contribution during the third week of August based on information supplied by the campaign commiteee, that his campaign had current outstanding primary debts at the time of BankPac's disbursement. The contribution was forwarded after ABA's Federal Legislative Representative, Peter Blocklin, was informed by Mr. Gramm's Administrative Assistant and Assistant Treasurer for the Committee, Ruth Cymber, of the existence of the outstanding primary debts, thus, the $5,000 contribution designated for the primary debt fell within permissible multicandidate contributions as:

> a contribution made after a primary election . . . and designated for the primary election . . . shall be made only to the extent that the contribution does not exceed net debts outstanding from the primary election . . . (11 C.F.R. 110.1(a)(2)).

8904074828

In summary, the American Bankers Association BankPac respectfully submits to the Federal Election Commission that the contribution of $5,000 to Rep. Gramm's principal campaign committee was clearly designated for the outstanding primary debt, the existence of which was indicated by an official of Rep. Gramm's campaign. Of course, Mr. Blocklin is available to appear before the Commission to attest to these facts. The American Bankers Association BankPac contends that, based on these facts, no action should be taken against the fund in connection with this matter.

Sincerely,

John J. Gill

Enclosures

Counsel Authorization
Check Copy

8904074829

BankPac

AMERICAN BANKERS ASSOCIATION
1120 CONNECTICUT AVE., N.W.
WASHINGTON, D.C. 20036

2008

15-3/540

August 14 1984

---- Friends of Phil Gramm---------- $ **10,000.00**

---- Ten Thousand and 00/100---------- DOLLARS

The RIGGS NATIONAL BANK
of WASHINGTON D.C.
MAIN OFFICE
1503 PENNSYLVANIA AVENUE, N.W.

Barbara M. Hunting

For R-Sen-TX, 5,000;'84 Primary Debt, 5,000;'84 General
(cand.)

⑈002008⑈ ⑆054000030⑆ 01⑈08368547⑈ ⑈0001000000⑈

TWO SIGNATURES REQUIRED OVER $500.00

Brian M. Meyer, Treasurer

RECEIVED BY THE FEC
GCC# 5636
84 NOV 15 A8:27

Hammonds Investments

REAL ESTATE INVESTMENTS

WILLARD H. HAMMONDS
Colony
Brittiany
Admiral Peary
Gaslight
Peachtree East
Peachtree West
Spanish Keys
Spanish Trail
La Posada
Pharos Plaza
Jackson Square — McAllen, Texas
Brittian Way — Irving, Texas
Lakeview Ranch — Kerrville, Texas
Apartment Services Co

P.O. BOX 6769
CORPUS CHRISTI, TEXAS 78411
AC 512-851-0811

84 NOV 15 A9:24
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

November 13, 1984

FEDERAL ELECTION COMMISSION:

ATTN: Patty Reilley - Kenneth A. Cross

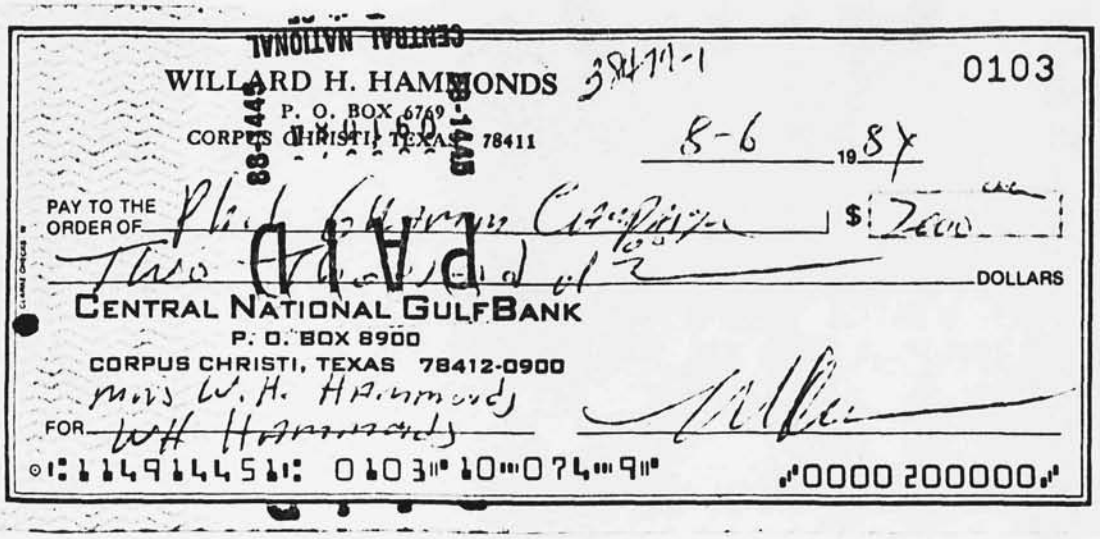
REF: MUR 1837

In answer to the complaint about my giving to much to the Gramm Campaign, I feel the complaint has no merit. There may have been an error in the reporting. The check in the amount of two thousand dollars was for both my wife and myself. I have enclosed a copy of the check which clearly notes my wifes name and mine. My wife and I made no other gift to the Gramm effort and do not feel there was a violation either in spirit or fact.

Thanks,

W.H. Hammonds

8904074831



CENTRAL NATIONAL

WILLARD H. HAMMONDS 38477-1 0103

P. O. BOX 6769

CORPUS CHRISTI, TEXAS 78411

88-1445 88-1445

8-6 1987

PAY TO THE ORDER OF Phil Gramm Campaign $ 2000

Two Thousand 00/100 DOLLARS

PAID

CENTRAL NATIONAL GULFBANK

P. O. BOX 8900

CORPUS CHRISTI, TEXAS 78412-0900

FOR Mrs W. H. Hammonds

WH Hammonds

⑆114914451⑆ 0103⑈10⑉074⑉9⑈ ⑈0000200000⑈

8904074483 2

PAY TO THE ORDER OF
FIRST CITY NATIONAL BANK
OF BRYAN, TEXAS
FRIENDS OF PHIL GRAMM
#00-6489-0-01

Pay to the Order of
First City National Bank
of Bryan, Texas
Friends of Phil Gramm
#00-4292-7-01

89004744833

RECEIVED AT THE FEC
GCC#5465
84 NOV 16 AM : 50

INDUSTRIAL PROPERTIES CORPORATION
TOWER EAST-TWELFTH FLOOR
2700 STEMMONS FREEWAY
DALLAS, TEXAS 75207

JOHN M. STEMMONS
CHAIRMAN

November 13, 1984

84 NOV 16 P12:44

Federal Election Commission
Washington, D. C. 20463

Re: MUR 1837

Sirs:

The file sent me under date of November 1, 1984, on page 10 indicates that John M. Stemmons, Jr., my son, made contributions to Mr. Gramm in the primary election to the extent of $2,000 in two $1,000 donations. I have no knowledge of what my son gave, if anything, to the Gramm campaign. However, you are advised that two checks from my bank account were given payable to the Gramm campaign each in the amount of $1,000. One of these donations was made on behalf of my wife and one was made on my behalf from community funds. Mrs. Stemmons and I have been married for over fifty-two years and all income save and except from the sale of capital assets are community funds and are commingled.

You are thereford advised that I deny the charges made against me or in the name of my son, John M. Stemmons, Jr.

Respectfully,

John M. Stemmons

8204074834

RECEIVED AT THE FEC
GCC# 5777
84 NOV 26 A 9:

BENSON AUTOMOTIVE WORLD
TOM BENSON

November 14, 1984

84 NOV 26 P12:06

Mr. Kenneth A. Gross
Associate General Counsel
1325 K. Street, N.W.
Washington, D.C. 20463

RE: MUR 1837

Dear Mr. Gross:

Enclosed please find a copy of my check #923, made payable to Phil Gramm Reelection Fund in the amount of $2,000.00. As was indicated on the check, the donation was made on behalf of my wife and I. The conflict apparently arose when two $1,000.00 donations were erroneously shown on behalf of Mr. Thomas M. Benson, Jr., instead of $1,000.00 by Mr. Thomas M. Benson, Jr. and $1,000.00 for Mrs. Thomas M. Benson, Jr.

If you need any further information regarding this matter, please contact me.

Yours truly,

Tom Benson

TB/taw

Enclosure

8 9 0 4 0 7 4 4 8 3 5

512 341-3311
9400 SAN PEDRO
SAN ANTONIO, TEXAS
78216

504 837-0730
901 PAPWORTH AVE., SUITE 200
METAIRIE, LOUISIANA
70005

THOMAS A. [illegible], JR.
9400 SAN PEDRO [illegible]
SAN ANTONIO, TEXAS [illegible]

PAY TO THE ORDER OF [illegible]

Two thousand dollars and [illegible]

[illegible]

FOR Donation [illegible]

⑈0009?3⑈ ⑆[illegible]⑆ [illegible]⑈ ⑈0000200000⑈

8 9 0 4 0 7 4 1 8 3 6

[illegible]

[illegible]

[illegible]

RECEIVED AT THE FEC
GCC#5727
84 NOV 20 A 8:43

Michael D. Hutchison

November 14, 1984

14 NOV 20 A10:05

Mr. Charles N. Steele
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Steele:

Acknowledgement is made of your letter dated November 1, 1984. Please be advised that in my opinion the contribution which I made to the Phil Gramm campaign does not violate the Federal Election Campaign Act of 1971, as ammended, since said contribution of $2,000.00 was to have been divided equally between the primary and the general election. I am sure that any information which you received to the contrary from the Phil Gramm campaign was in error and I have advised the Gramm campaign of that error by sending them a copy of this letter.

If you need any further information pertaining to this matter, please let me know.

Sincerely,

Michael D. Hutchison

cc: Friends of Phil Gramm

8 9 0 4 0 7 4 4 8 3 7

FREEMAN OLDS— MAZDA CO.
1800 East Airport Freeway 438-2121
Irving, Texas 75062

RECEIVED BY THE FEC
MUR #1837
84 NOV 19 A9:44

November 14, 1984

84 NOV 19 A11:46

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

RE: MUR 1837

Dear Mr. Gross:

In response to the complaint of my violating the Federal Election Campaign Act of 1971, I hereby react.

On or about Saturday, August 18 I met with Phil Gramm at the Fairmont Hotel and presented his campaign representative with a check for $3000 from Mr. & Mrs. J. W. Freeman. This $3,000 was for a joint dinner party which would give $2,000 to Phil Gramm, $500 to Ronald Reagan and $500 to the Republican Party. My mistake was that I made the check to Phil Gram which evidentally made it illegal. However, Mr. Gramm's office promptly refunded $1,000 of which I deposited in my bank account.

If this is not explanatory or further information is required to close this matter, please notify me immediately.

Sincerely,

Jerry W. Freeman

Jerry W. Freeman

JWF:ff

RECEIVED AT THE FEC
GCC#5769
84 NOV 23 AM : 06

Don Lummus
1413 Amazon
Plano, Texas 75075

84 NOV 23 P12:08

Federal Election Commission
Washington, D.C. 20463

November 15, 1984

Re: MUR 1837

Gentlemen:

With regard to the subject case, please be advised that I did in fact contribute $2000 to the Phil Gramm campaign. I contributed $1000 to the primary campaign, check No. 144 dated November 30, 1983 and drawn on the Signature Place Bank of Dallas. I also contributed $1000 to the general campaign, check No. 256 dated July 23, 1984 (well after the May primary election). It is my understanding that a $1000 contribution to each is perfectly legal.

Sincerely,

A.D. Lummus

ADL/as

8904074483 9

Allen Oldsmobile-Cadillac, Inc.
"Where Satisfaction Is Standard Equipment"
2401 Texas Ave. P. O. Box 3902 Telephone (713) 779-3516
BRYAN, TEXAS 77805-3902

RECEIVED BY THE FEC
GCC#5788
84 NOV 23 AM : 12
84 NOV 26 PM 12:08

11-15-84

Gentlemen,

Listed below you will find listed the contributions I have made to Sen. Gramm's campaign.

(1) On March 21, 1984, a contribution of $500.00 was made during the primary campaign.

(2) On Aug. 28, 1984, a contribution of $1000.00 was made during the general election campaign.

(3) On Sept. 5, 1984 I purchased a ticket for my sister-in-law, Mrs. Jean Aycock, in the amount of $50.00, to a bar-be-que honoring Phil Gramm.

Sincerely,

C. Allen

8904074840

ERNEST FAY
2304 First City National Bank Bldg.
HOUSTON, TEXAS 77002

November 15, 1984

RECEIVED BY THE FEC
84 NOV 19 A10:06
84 NOV 19 A11:46

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

Dear Ms. Reilly:

In line with our telephone conversation, this is to advise you that my contribution to the Gramm campaign was made from community funds and one-half of this was from my wife.

Yours Sincerely,

Ernest Fay

ERNEST FAY

Subscribed and sworn to before me this 15th day of November, 1984.

Ira V. James

Notary Public, State of Texas.

11-30-84

EF:j

CC: Mr. James F. Schoener, Esq.
Miller, Canfield, Paddock & Stone
1015 15th Street, NW, Suite 1200
Washington, D C 20005

8900744841

EDWARDS PETROLEUM CO.
P. O. BOX 2431
BIG SPRING, TEXAS 79720
915-398-5470

RECEIVED AT THE FEC
6-CC.#5785
84 NOV 20

November 15, 1984

Mr. Kenneth A. Gross
Federal Election Commission
Washington, D. C. 20463

90 NOV 13 AM 9:06

Dear Mr. Gross:

This letter is in response to your letter dated November 1, 1984; RE: MUR 1837. The only funds to ever pass from me to Mr. Phil Gramm are a check writted on August 14, 1984 in the amount of $ 3,000.00 made payable to "The Presidential Nomination Breakfast Ball". This check was mailed to Dallas, Texas, c/o Mr. Phil Gramm for the purchase of two tickets to the ball held on August 23, 1984 with each ticket costing $ 1,500.00 each. Enclosed is a copy of my cancelled check and the correspondence which I received regarding the breakfast ball. I repeat again, these are the only funds which I have sent in care of Mr. Phil Gramm. I do not have any knowledge of where the information came from concerning two donations at $ 1,000.00 each. Obviously, there has been some misunderstanding here. If you have any further questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Karen Edwards

Ms. Karen Edwards

Enclosures

STATE OF TEXAS

COUNTY OF GLASSCOCK

Before me, the undersigned notary public in and for the State of Texas, personally appeared Karen Edwards who swears the the foregoing statement is true and correct, on this the 15th day of November, 1984.

William W. Hull

Notary Public, State of Texas
WILLIAM W. HULL, Notary Public
State of Texas
Commission expires 10/9/88

8900074484842

GCC#567D
RECEIVED AT THE FEC
HAND DELIVERED
84 NOV 15 P4:00

BAKER & HOSTETLER
ATTORNEYS AT LAW
815 CONNECTICUT AVE., N.W.
WASHINGTON, D. C. 20006
(202) 861-1500
TELECOPIER (202) 857-0010

IN CLEVELAND, OHIO
3200 NATIONAL CITY CENTER
CLEVELAND, OHIO 44114
(216) 621-0200
TWX 810 421 8375

IN COLUMBUS, OHIO
65 EAST STATE STREET
COLUMBUS, OHIO 43215
(614) 228-1541

IN DENVER, COLORADO
SUITE 1100, 303 EAST 17TH AVENUE
DENVER, COLORADO 80203
(303) 861-0600

IN ORLANDO, FLORIDA
13TH FLOOR BARNETT PLAZA
ORLANDO, FLORIDA 32801
(305) 841-1111

WRITER'S DIRECT DIAL NO.:
(202) 861-1531

November 15, 1984

84 NOV 16 P12:45

BY HAND

Ms. Patty Reilly
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Matter Under Review 1837

Dear Ms. Reilly:

This office represents the National Association of Home Builders BUILD Political Action Committee ("BUILDPAC"). On November 7, 1984, BUILDPAC received a letter dated November 1, 1984 from Charles N. Steele, general counsel of the Federal Election Commission, and a complaint signed by Donna Mobley. Enclosed is a completed Statement of Designation of Counsel form.

BUILDPAC requests an extension of time to and including December 7, 1984 within which it may respond to the allegations contained in Ms. Donna Mobley's complaint. BUILDPAC needs the extension because it intends to obtain affidavits from individuals as well as prepare a factual and legal statement which will show conclusively that BUILDPAC did not violate any provision of the federal election laws. BUILDPAC employees and persons from whom information must be obtained took time off after the general election and as a result BUILDPAC needs an additional fifteen days to file its response. Furthermore, the Thanksgiving holiday falls within BUILDPAC's initial fifteen day response period.

For the aforementioned reasons, BUILDPAC respectfully requests an extension of time to and including December 7, 1984.

Very truly yours,

William H. Schweitzer

William H. Schweitzer

cc: Thomas Baker
John Kinas

8 3 0 4 0 7 4 4 8 4 3

RECEIVED AT THE FEC
MUR #5689
84 NOV 16 P3:37

ANDREWS & KURTH
ATTORNEYS
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 861-7400
TELEX: 79-1208
TELECOPIER (202) 861-7437

TEXAS COMMERCE TOWER
HOUSTON, TEXAS 77002
(713) 220-4200

4400 THANKSGIVING TOWER
DALLAS, TEXAS 75201
(214) 979-4400

November 16, 1984

84 NOV 19 AM 11:47

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
Franklin Square North
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Steele:

On November 8, 1984, Robert L. Bradley received a letter from you informing Mr. Bradley that the Federal Election Commission (the "Commission") had received a complaint alleging that Mr. Bradley had violated certain sections of the Federal Election Campaign Act of 1971, as amended. In your letter you stated the Mr. Bradley had fifteen days from the receipt of your letter within which to demonstrate that no action should be taken by the Commission. Thus, Mr. Bradley must respond by November 23, 1984, or else forfeit his opportunity answer the complaint before the Commission decides whether to take further action.

On behalf of Mr. Bradley, I request a fourteen day extension of time, until Decmeber 7, 1984, for Mr. Bradley to make a written answer to the complaint. The reasons for this extension are as follows. While your letter was received by Mr. Bradley's office of Novmeber 8, 1984, Mr. Bradley himself did not return from an extended business trip until November 14, 1984, at which time your letter was brought to his attention. Mr. Bradley has planned an extended Thanksgiving holdiay beginning November 19, 1984, and he will not return to his office until November 26, 1984. Thus, it is apparent that within the fifteen day period for answering the complaint, Mr. Bradley has not had, and will not have, much time to prepare his answer. Mr. Bradley is confident that this matter can be expeditiously resolved once he has had an opportunity to submit evidence. This extension will not projudice any party to this proceeding. Therefore, Mr. Bradley should be granted an extension of time until December 7, 1984 within which to demonstrate that no action should be taken against him in this matter.

Very truly yours,

Donald F. Santa, Jr.

Donald F. Santa, Jr.
Attorney for
Robert L. Bradley

DFS/crw
cc: Robert L. Bradley
Michael F. Butler

8 9 0 0 4 0 7 4 8 4

RECEIVED BY THE FEC
MUR #574
84 NOV 20 AM : 51

JIM BETTERSWORTH
P. O. BOX 1314
SEGUIN, TEXAS 78155
512 · 379-0380

84 NOV 20 P12:25

November 16, 1984

Federal Election Commission
Ms. Patty Reilly
1325 K Street, NW
Washington, DC 20463

Dear Ms. Reilly:

I really appreciate you allowing me to respond to the FEC's complaint relative to Montana McKean. The facts are as follows:

1. Check #160 in the amount of $1,000.00 payable to the "Friends of Phil Graham" is from Mrs. Montana McKean. Mrs. McKean is a widow in her 80's.

2. Check #222 from McKean Properties is a check representing funds of John Byron McKean, a son of the above Mrs. McKean. McKean Properties is a "name only" account used by Byron McKean for investments. In reality the account represents his personal funds.

3. J. A. Bettersworth and Joe A. Mueller manage funds for both Montana and John Byron. They individually instructed us to write the checks, copies of which are attached.

I apologize for any inconvenience caused by what appears to be two checks from the same person. Copies of signature cards for each individual relative to the accounts in which the checks are written are available if necessary.

If you have further questions, please let me know.

By the way, it was very gratifying to have you respond as you did to our concern over disturbing Mrs. McKean. My personal thanks for your considerate attention.

Sincerely,

J. A. Bettersworth

SWORN TO AND ACKNOWLEDGED BEFORE ME this 16th day of November, A.D., 1984.

Dixie Lehmann
my commission expires
11-30-84

Notary Public in and for
the State of Texas

820074848

8 9 0 4 0 7 4 4 8 4 6

MONTANA MC KEAN 0783
OIL ACCOUNT
P.O. BOX 1169 379-0380
SEGUIN, TEXAS 78155

7900

160

July 20 1984

88-1222
1149

PAY TO THE ORDER OF Friends of Phil Graham $ 1,000.00

ONE THOUSAND AND NO/100******* DOLLARS

2 SIGNATURES REQUIRED

FIRST COMMERCIAL BANK
P.O. BOX 1169
SEGUIN, TX 78155

PAID
AUG -6 84 - - -
COMMERCIAL BANK, N.A.
SEGUIN
1222 TEXAS 88-1222

FOR

⑆114912220⑆ 00⑈0064⑈7⑈ 0160 ⑈0000100000⑈

HARLAND-28

McKEAN PROPERTIES 0783
P.O. BOX 1169 379-2258
SEGUIN, TEXAS 78155

7900

222

July 20 1984

88-1222
1149

PAY TO THE ORDER OF Friends of Phil Graham $ 1,000.00

ONE THOUSAND AND NO/100******* DOLLARS

TWO SIGNATURES REQUIRED

FIRST COMMERCIAL BANK
P.O. BOX 1169
SEGUIN, TX 78155

PAID
AUG -6 84 - - -
COMMERCIAL BANK, N.A.
SEGUIN
88-1222 TEXAS 88-1222

FOR

⑆114912220⑆ 00⑈0032⑈9⑈ 0222 ⑈0000100000⑈

HARLAND-28

RECEIVED BY THE FEC
GC C#5755
84 NOV 23 A9:11

ELLOINE M. CALDER
1265 Hartford Bldg. • Dallas, Texas 75201 • (214) 922-8029

November 19, 1984

84 NOV 23 A10:52

Mr. Kenneth A. Gross
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: MUR 1837

Dear Mr. Gross:

We have received your letter of November 1, 1984, concerning a complaint filed against Phil Gramm and others. Although the letter states that the complaint alleges that Mrs. Calder has violated the Federal Election Compaign Act, the complaint actually does not name Mrs. Calder as a respondent or charge her with any such violations. Mrs. Calder, of course, does not have any personal knowledge concerning the primary debt which constitutes the basis of the complaint, but understands that Mr. Gramm and the other respondents will provide information to address any concerns you may have.

Thank you for your consideration of this matter.

Sincerely,

James R. Jameson
Business Manager for
Elloine M. Calder

8904074847

RECEIVED AT THE FEC
OCC#5790
84 NOV 26 A10:53

LAW OFFICES
BEVERIDGE & DIAMOND, P.C.
1333 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON, D.C. 20036

(202) 828-0200
TELECOPIER(202)828-0234
WRITER'S DIRECT DIAL NUMBER

(202) 828-0281

BEVERIDGE & DIAMOND
SUITE 2506
101 PARK AVENUE
NEW YORK, N.Y. 10178
(212) 557-3355

JIM J. TOZZI
CONSULTING ECONOMIST

HENRY L. DIAMOND
ALBERT J. BEVERIDGE, III
GARY H. BAISE
HAROLD HIMMELMAN
CHRISTOPHER H. BUCKLEY, JR.
EDWARD H. FORGOTSON
J. MARSHALL COLEMAN
STEPHEN L. GORDON
JONATHAN Z. CANNON
ALEXANDER W. SIERCK
JOHN N. HANSON
ANDREW E. MISHKIN
GAINES GWATHMEY, III
CYNTHIA A. LEWIS
KARL S. BOURDEAU
JOHN S. GUTTMANN
STEPHEN R. MELTON
DON G. SCROGGIN
AMY L. EDWARDS
ROBERT BRAGER
JOHN R. ELDRIDGE
RICHARD S. DAVIS
THOMAS RICHICHI
CHRISTINA T. SIMMONS
DEAN H. CANNON
VIRGINIA S. ALBRECHT
PAUL E. SHORB, III
ELISABETH A. ROBINSON

CARL EARDLEY
OF COUNSEL

84 NOV 26 P12:09

Ms. Patty Reilly
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20643

Re: MUR 1837

Dear Ms Reilly:

Enclosed are the affidavits of Anne Alison Pickens and Paige Gardner Pickens, along with copies of the checks written to Friends of Phil Gramm. As stated in these affidavits, Mmes. Anne and Paige Pickens each contributed only $1,000 to the Gramm campaign. They therefore cannot possibly be said to have violated the Federal Election Campaign Act or the regulations promulgated thereunder.

As noted in the affidavits, Mr. and Mrs. Robert H. Pickens also each contributed $1,000 to Friends of Phil Gramm. They are not listed in Exhibit 4, however, and it is possible that the Gramm election committee made an error in accounting and credited their contribution to Anne and Paige Pickens. While we can only surmise about the cause of the accounting error, one thing is certain--neither Anne Alison Pickens nor Paige Gardner Pickens possibly violated the Federal Election Campaign Act.

Our clients were disturbed by receipt of the Federal Election Commission notice. They are not accustomed to receipt of legal process, no matter how benign. Your expeditous resolution of this issue would therefore be greatly appreciated.

Cordially,

Robert Brager

Robert Brager

RB/bjd
Enc.

8904074848

RE: MUR 1837

I, Paige Gardner Pickens, of 3926 Potomac Street, Dallas Texas 75205, do hereby swear, under penalty of perjury pursuant to 28 U.S.C. S 1746, as follows:

1. I have received notification from the Federal Election Commission that a complaint has been filed against Senator-elect Phil Gramm and others. This complaint alleges certain violations of the Federal Election Campaign Act. I understand that I received notification because my name appears in Exhibit 4 to the complaint. According to page 2 of the complaint, exhibit 4 is "[a] copy of the entries from the Gramm reports for those individuals and PAC's who have given the Gramm campaign more than the respective $1,000 and $5,000 contribution limits since May 5, 1984."

2. Exhibit 4 does not accurately reflect my contribution to the Gramm campaign. On July 12, 1984, I wrote one check, for $1,000, to Friends of Phil Gramm. This check was my only contribution to the Gramm campaign. A copy of this check is affixed as Attachment 1.

3. On July 12, 1984, my sister Anne Alison Pickens contributed $1,000 to Friends of Phil Gramm. On that same date, my parents, Mr. and Mrs. Robert H. Pickens, jointly contributed $2,000 to Friends of Phil Gramm. Copies of their checks are included in Attachment 1.

Further affiant sayeth not.

Paige Pickens
Paige Gardner Pickens

November 16, 1984

8204074449

RE: MUR 1837

I, Anne Alison Pickens, of 3926 Potomac Street, Dallas, Texas 75206, do hereby swear, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I have received notification from the Federal Election Commission that a complaint has been filed against Senator-elect Phil Gramm and others. This complaint alleges certain violations of the Federal Election Campaign Act. I understand that I received notification because my name appears in Exhibit 4 to the complaint. According to page 2 of the complaint, exhibit 4 is "[a] copy of the entries from the Gramm reports for those individuals and PAC's who have given the Gramm campaign more than the respective $1,000 and $5,000 contribution limits since May 5, 1984."

2. Exhibit 4 does not accurately reflect my contribution to the Gramm campaign. On July 12, 1984, I wrote one check, for $1,000, to Friends of Phil Gramm. This check was my only contribution to the Gramm campaign. A copy of this check is affixed as Attachment 1.

3. On July 12, 1984, my sister Paige Gardner Pickens contributed $1,000 to Friends of Phil Gramm. On that same date, my parents, Mr. and Mrs. Robert M. Pickens, jointly contributed $2,000 to Friends of Phil Gramm. Copies of their checks are included in Attachment 1.

Further affiant sayeth not.

Anne Alison Pickens

Anne Alison Pickens

11-16-84

Date

3204074850

RECEIVED AT THE FEC
HAND DELIVERED
84 NOV 20 A10:18
OCC#5742

AmericanAirlines

November 19, 1984

84 NOV 20 P12:25

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1837

Dear Mr. Steele:

Mr. Gene E. Overbeck has authorized me to serve as his attorney in the above-captioned matter. He received the complaint on November 7, 1984. Please regard this as Mr. Overbeck's response to those allegations of the charge which pertain to him.

Initially, I note that the complaint by Ms. Donna Mobley in this case has not named Mr. Overbeck as a respondent. (See Preamble to complaint). In any event, if the complaint by her is directed at Mr. Overbeck, it is wholly unfounded. Mr. Overbeck made no personal contributions to Mr. Gramm. The contributions attributed to him by the FEC Report which was attached to the complaint (see Attachment 1 for the specific pages), were, in fact, made by the American Airlines Political Action Committee of which Mr. Overbeck is Chairman. Apparently, the contributions from the PAC were mistakenly ascribed to Mr. Overbeck because he sent the letter transmitting the checks. For you information, I have attached copies of the pages from the PAC's monthly reports for May, 1984, and August, 1984, which disclosed the $2,500 in contributions to the "Friends of Phil Gramm".

It is evident, therefore, that Mr. Overbeck made no improper contributions. The complaint as to him should be dismissed for lack of merit.

If you wish to discuss this matter, please call me at (817) 355-1266.

Very truly yours,

David A. Schwarte

David A. Schwarte
Attorney

Attachments

cc: Mr. G. E. Overbeck

8904074851

(name and address)	(employer and occupation)	(date)	(amount)
[redacted]	Akin, Gump, St[redacted], Hauer, and Feld	05/07/84	$1,000.0
	attorney		
Received for General Election	Aggregate year-to-date:	$1,000.00	

(name and address)	(employer and occupation)	(date)	(amount)
Mrs. Carl E. Oates 6924 Stefani Dallas, TX 75225		9/24/84	$1,000.00
	Housewife		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Carl E. Oates 6924 Stefani Dallas, TX 75225	Self Employed	9/24/84	$1,000.00
	Attorney		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Carl E. Oates 6924 Stefani Dallas, TX 75225	Self Employed	9/24/84	$1,000.00
	Attorney		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Gene E. Overbeck 1101 - 17th Street, N. W. Washington, DC 20036	American Airlines	9/10/84	$1,000.00
	Sr. V.P.		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	
Mr. Gene E. Overbeck 1101 - 17th Street, N. W. Washington, DC 20036	American Airlines	9/10/84	$1,000.00
	Sr. V.P.		
Received For PRIMARY Election	Aggregate Year-To-Date:	$2,000.00	

VIOLATIONS
(exceeding $1000.00)

0

(name and address)	(employer and occupation)	(date)	
Mr. C. O. Overcash 3850 Bellaire Circle Fort Worth, TX 76109	Self Employed	9/24/84	$1,000.00
	Developer		
Received For GENERAL Election	Aggregate Year-To-Date:	$2,000.00	

(name and address)	(employer and occupation)	(date)	(amount)
Mr. C.O. Overcash 3850 Bellaire Circle Fort Worth, TX 76109	[redacted]		
Received for Primary Election	Aggregate year-to-date	$1,000.00	

8900744852

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for LINE NUMBER 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

5/1/84 through 5/31/84

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

Name of Committee (in Full)

American Airlines Political Action Committee (C00107300)

A. Full Name, Mailing Address and ZIP Code George W. Heim, Treasurer 19 Fleetwood Avenue Albany, NY 12208	Purpose of Disbursement '84/Primary NYS Senate Repub. Campaign Committee. 1984 TOTAL $150. Disbursement for: ☒Primary ☐General ☐ Other (specify):	Date (month, day, year) 5-7-84	Amount of Each Disbursement This Period $150.00
B. Full Name, Mailing Address and ZIP Code Friends of Phil Gramm Drawer AO College Station, TX 77840	Purpose of Disbursement '84/Primary Cong. Phil Gramm R-6-TX 1984 TOTAL $500.00 Disbursement for: ☒Primary ☐General ☐ Other (specify):	Date (month, day, year) 5-14-84	Amount of Each Disbursement This Period $500.00
C. Full Name, Mailing Address and ZIP Code Reelect Senator Mark Hatfield Comm. P. O. Box 3307 Salem, Oregon 97302	Purpose of Disbursement '84/Primary Mark Hatfield R-OR 1984 TOTAL $1,000.00 Disbursement for: ☒Primary ☐General ☐ Other (specify):	Date (month, day, year) 5-14-84	Amount of Each Disbursement This Period $1,000.00
D. Full Name, Mailing Address and ZIP Code Friends of Eldon Rudd Committee P. O. Box 23565 L'Enfant Plaza Station Washington, DC 20024	Purpose of Disbursement '84/Primary Cong. Eldon Rudd R-4-AZ 1984 TOTAL $250.00 Disbursement for: ☒Primary ☐General ☐ Other (specify):	Date (month, day, year) 5-14-84	Amount of Each Disbursement This Period $250.00
E. Full Name, Mailing Address and ZIP Code The Keep Nick Rahall in Cong. Comm. P. O. Box 1122 Washington, DC 20013	Purpose of Disbursement '84/Primary Cong. Nick Rahall D-4-WV 1984 TOTAL $100.00 Disbursement for: ☒Primary ☐General ☐ Other (specify):	Date (month, day, year) 5-14-84	Amount of Each Disbursement This Period $100.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			$2,000.00
TOTAL This Period (last page this line number only)			$2,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule(s) for each category of the Detailed Summary Page)

8-1-84 through 8-31-84

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

Name of Committee (in Full)

American Airlines Political Action Committee (C00107300)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mike Andrews for Congress Committee c/o John L. Sharman First City Tower Bldg. Suite 2500, 1001 Fannin Houston, TX 77002	Mike Andrews D-25-TX) 1984 Total: $250.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8-8-84	$250.00
B. Full Name, Mailing Address and ZIP Code Bud Shuster for Congress Committee P. O. Box 23917 L'Enfant Plaza Station Washington, DC 20024	Purpose of Disbursement Bud Shuster (R-9-PA) 1984 Total: $250.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 8-8-84	Amount of Each Disbursement This Period $250.00
C. Full Name, Mailing Address and ZIP Code Elect Senator Anderson Committee Earl J. Daniels, Treas. 742 Security Mutual Bldg. Binghamton, NY 13901	Purpose of Disbursement (R-51-NY St. Warren M. Anderson 1984 Total: $50.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 8-8-84	Amount of Each Disbursement This Period $50.00
D. Full Name, Mailing Address and ZIP Code Presidential Nomination Breakfast Ball 2451 Stemmons Freeway Dallas, TX 75207	Purpose of Disbursement Presidential Nomination Breakfast Ball Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 8-22-84	Amount of Each Disbursement This Period $3,000.00*

* $2,000.00 to Phil Gramm (1984 Total: $2,500.00
500.00 to Reagan-Bush (1984 Total: 4,500.00
500.00 to Republican Host Committee (1984 Total: 500.00

F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bill Schuette for Congress Comm. Alan W. Ott, Treas. P. O. Drawer 351	Bill Schuette (R-10-MI) 1984 Total: $500.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8-23-84	$500.00
G. Full Name, Mailing Address and ZIP Code Wes Watkins for Congress Committee Mark Griffin, Treas. P. O. Box 1982 Ada, OK 74810	Purpose of Disbursement Wes Watkins (D-3-OK) 1984 Total: $100.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 8-23-84	Amount of Each Disbursement This Period $100.00
H. Full Name, Mailing Address and ZIP Code Friends of Assemblyman Peter Sullivan P. O. Box 55 Valhalla, NY 10595	Purpose of Disbursement (R-87- Peter M. Sullivan NY State) 1984 Total: $50.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 8-13-84	Amount of Each Disbursement This Period $50.00
I. Full Name, Mailing Address and ZIP Code Glenn Anderson Campaign Committee George Geary, Treas. 5216 Hagan Rd. Temple Hills, MD 20748	Purpose of Disbursement Glenn M. Anderson (D-32-CA) 1984 Total: $250.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 8-28-84	Amount of Each Disbursement This Period $250.00
SUBTOTAL of Disbursements This Page (optional)			$4,450.00
TOTAL This Period (last page this line number only)			

8 9 0 4 0 7 4 4 8 5 4

RECEIVED AT THE FEC
GLC#5745
84 NOV 21 AM : 15

Transco Energy Company

2800 Post Oak Boulevard
P. O. Box 1396
Houston, Texas 77251
713-439-2000

21 NOV 84 PM 12:40

November 20, 1984

Mr. Charles N. Steele
Federal Election Commission
1325 K Street
Washington, D.C. 20463

Dear Mr. Steele:

This letter is in response to your November 1, 1984 letter addressed to Mr. Ross Workman. As the attached affidavits of Mr. Workman and Mr. Gray attest, Senator Gramm's office apparently incorrectly listed Mr. Workman as the contributor of the $1,000 check. The correct contributor was in fact TRANSPAC. Since Mr. Workman made no individual contribution to Senator Gramm, I respectfully request that the Commission find no reason to believe that either Mr. Workman nor TRANSPAC has violated the Federal Election Campaign Act of 1971, as amended.

Sincerely,

Raymond P. Albrecht
Attorney

RPA/lt

Attachments

8904074485

AFFIDAVIT OF ROSS WORKMAN

STATE OF TEXAS §
§
COUNTY OF HARRIS §

Before me the undersigned authority, personally appeared ROSS WORKMAN, who after being first duly sworn upon his oath stated as follows:

1. My name is Ross Workman. I live in Houston, Texas. I was employed by Transco Energy Company from April 25, 1983 to November 1, 1984 as Vice President-Governmental Affairs.

2. I have never made a campaign contribution of $1,000 to Phil Gramm or to the Friends of Phil Gramm.

3. I do not remember making a campaign contribution of $50 to Phil Gramm or to the Friends of Phil Gramm.

4. My files indicate that TRANSPAC, Transco Energy Company's Political Action Committee, made a $1,000 contribution to the Friends of Phil Gramm on June 6, 1984. See Exhibit "A".

5. I am unaware why the Friends of Phil Gramm attributed this check to me personally.

6. My files show no contribution in the amount of $50 to Phil Gramm or to the Friends of Phil Gramm.

Ross Workman

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned authority, on this the 20th day of November, 1984.

Notary Public in and for
the State of Texas

JULIE HARRISON
Notary Public in and for the State of Texas
My Commission Expires 6-14-85

9004074850

EXHIBIT "A"

No. 122

Bank of San Felipe Green
A Southwest Bank
P.O. Box 27648, Houston, Texas 77027

June 6, 1984

PAY TO THE ORDER OF Friends of Phil Gramm $1,000.00

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

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

Contribution

TRANSRAD 03-82

⑆113009008⑆ ⑈003387⑈

Dear Phil,

✓ I will attend the reception at the Warwick Post Oak Hotel on June 12 and I have enclosed a check for 1 ticket(s) at $1,000 per person.

___ I am sorry that I will not be able to join you on June 12, but have enclosed a contribution of $_____ for your campaign.

H. J. Bowen — Name

Pennzoil Energy Co. — Business

P.O. Box 1396 — Address

Chairman & CEO — Occupation

Houston, Tx. 77251 — City/State/Zip

439-3103 / — Business Phone / Home Phone

Please make all checks payable to:
"Friends of Phil Gramm"

PAID FOR BY THE FRIENDS OF PHIL GRAMM

6-7-84

SPECIAL NOTICE



President Gerald Ford will be in Houston on Tuesday, June 12, 1984 as a special guest at a **Phil Gramm** reception hosted by Rob Mosbacher.

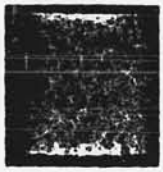
Your contribution of $1,000 in response to this letter entitles you to attend this reception.

The Warwick Post Oak Hotel
2001 Post Oak Boulevard
Houston, Texas

6-8 PM
Concord Room

Reservations and information
Nannette Mayo (713) 850-9950

8 9 0 4 0 7 4 4 8 5 8





AFFIDAVIT OF RODNEY L. GRAY

THE STATE OF TEXAS §
§
COUNTY OF HARRIS §

Before me the undersigned authority, personally appeared RODNEY L. GRAY who after being first duly sworn upon his oath stated as follows:

1. My name is Rodney L. Gray. I live in Houston, Texas. I am employed by Transco Energy Company as Assistant Treasurer.

2. I am the Assistant Treasurer of TRANSPAC, Transco Energy Company's Political Action Committee.

3. TRANSPAC issued a check No. 122, dated June 6, 1984, made payable to the Friends of Phil Gramm. See Exhibit "A".

4. This is the only contribution I am aware of that TRANSPAC has made to Phil Gramm in 1984.

5. I do not know why the Friends of Phil Gramm attributed this contribution to Ross Workman personally.

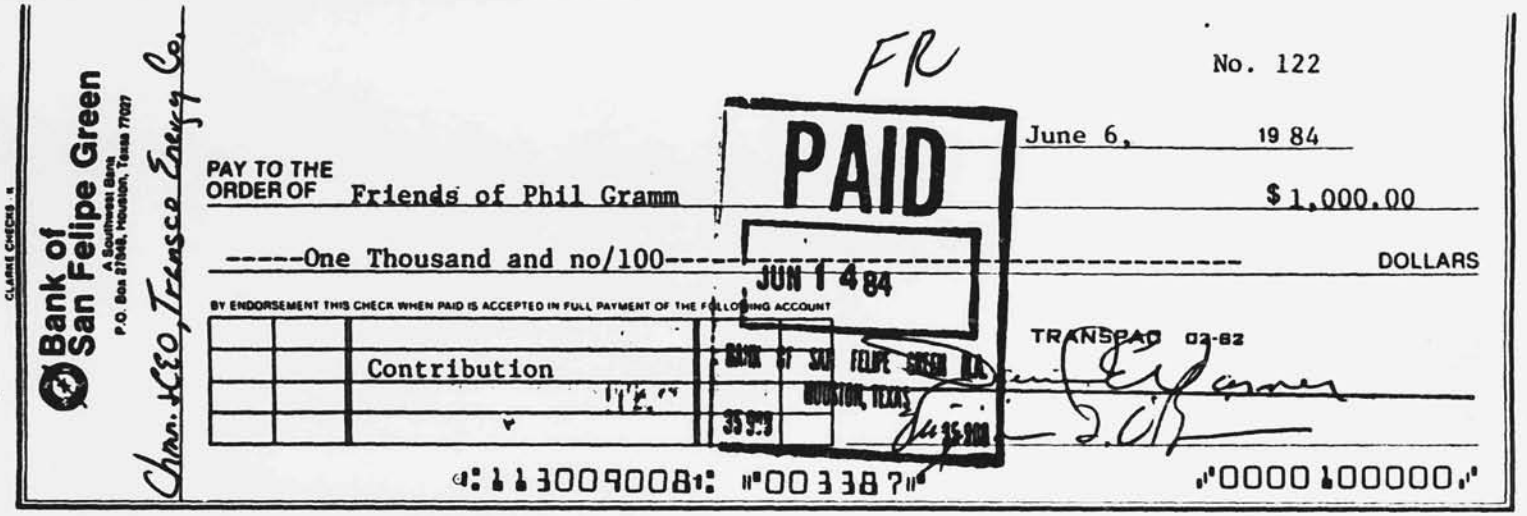
Rodney L. Gray

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned authority, on this the 26th day of November, 1984.

Notary Public in and for
the State of Texas

BEATRICE TORREGROSSA
Notary Public, State of Texas
My Commission Expires 8-09-86

R 900749859



Bank of San Felipe Green
A Southwest Bank
P.O. Box 27048, Houston, Texas 77027

Chan. Leo, Transco Energy Co.

FR

No. 122

PAID

JUN 14 84

June 6, 19 84

PAY TO THE ORDER OF Friends of Phil Gramm $1,000.00

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

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

Contribution

BANK OF SAN FELIPE GREEN N.A. HOUSTON, TEXAS

TRANSPAC 03-82

⑆113009008⑆ "00338?" "0000100000"

EXHIBIT "A"

TC-414/11-81 RECORDS CONTROL

22H11 ASAP

O'BRIEN VIRGINIA

O'BRIEN VIRGINIA

CORP SECY/FIN&SECUR

11.16.84 11.30.84

TRANS----16 NOV 84
REC CCK*TBOSFG*#122

8904074486 0

8904074861

TRANS----16 NOV 84
REC CCK*TBOSFG*#1 22

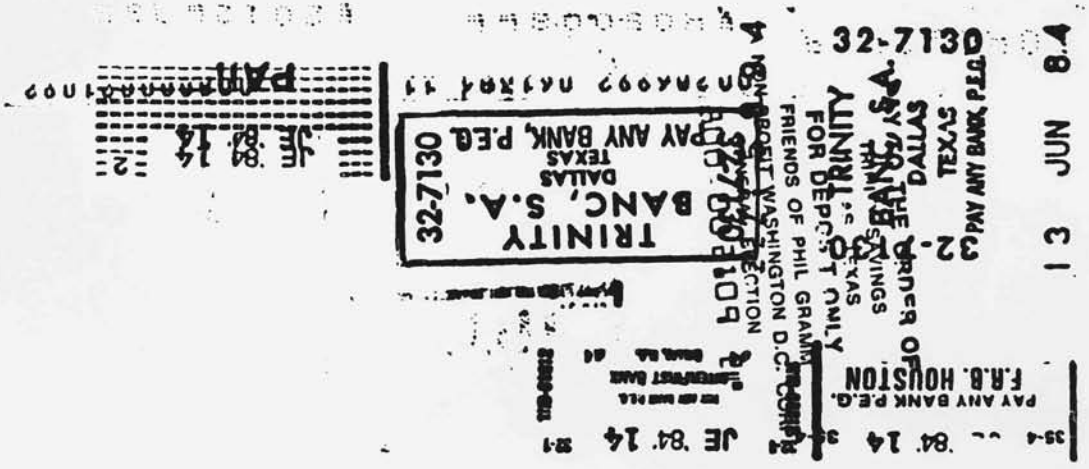
11.16.84 11.30.84

CORP SECY/FIN&SECUR

O'BRIEN VIRGINIA
O'BRIEN VIRGINIA

22H11 ASAP

TC-414/11-81 RECORDS CONTROL



RECEIVED AT THE FEC
GCC#5776
84 NOV 26 A 9:33

THOMAS E. HARTIN
4141 BLUE LAKE CIRCLE
SUITE 165
DALLAS, TEXAS 75234
(214) 392-4411

84 NOV 26 P12:06

November 20, 1984

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1837

Sir:

In response to your letter dated November 1, 1984 and received by me on November 8, 1984 I deny the alleged violations of the Federal Election Campaign Act of 1971 as stated.

According to my records the only money that I sent in calendar year 1984 that may have been received in Phil Gramm's behalf was a check dated August 22, 9184 in the amount of $3,000.00 made out to the Presidential Nomination Breakfast Ball. It was my understanding that the money would be shared by the Friends of Phil Gramm, Republican Host Committee, Texas Victory Committee, and the National Republican Senatorial Committee. All four of these entities I endorse.

I authorize the firm of Miller, Canfield, Paddock and Stone to represent my interest in this matter and authorize them to receive any notification or other communication from the Commission.

Sincerely,

Thomas E. Hartin

8 9 3 4 0 7 4 4 8 6 2

8900744863

PRESIDENTIAL NOMINATION BREAKFAST BALL

Hyatt Regency, Dallas, Texas
August 23, 1984
9pm to 2am

Table No. 61

FRIENDS OF PHIL GRAMM
REPUBLICAN HOST COMMITTEE
TEXAS VICTORY COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

RECEIVED BY THE FEC
GCC#5782
84 NOV 26 A 9:08

1803 Denton Drive
Carrollton, TX 75006
November 20, 1984

84 NOV 26 P12:07

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

Re: MUR 1837

Dear Ms. Reilly:

I have enclosed affidavits from myself and Mrs. G. W. Sanford regarding the amounts of our political contributions. Also enclosed are copies of the cancelled checks in question.

Sincerely,

G. W. Sanford

G. W. Sanford

GWS/cac

Enclosures

VIA SPECIAL DELIVERY

8004074864

AFFIDAVIT

Before ~~be~~ me the undersigned authority on this day personally appeared Mrs. G. W. Sanford known to me to be the person who subscribed ~~his~~ her name below and who after being first duly sworn by me on oath deposes and says:

On October 1, 1984, I issued a check to the "Phil Gramm for Senate" campaign. The check was for $1,000 and represents the only political contribution or payment of any kind whatsoever that I made to the "Phil Gramm for Senate" campaign.

Mrs. G. W. Sanford
MRS. G. W. SANFORD

Subscribed and sworn to before me this 20TH day of NOVEMBER 1984.

Kenneth Geisler
Notary Public
State of Texas

89040744865

AFFIDAVIT

Before me the undersigned authority on this day personally appeared G. W. Sanford known to me to be the person who subscribed his name below and who after being first duly sworn by me on oath deposes and says:

On October 1, 1984, I issued a check to the "Phil Gramm for Senate" campaign. The check was for $1,000 and represents the only political contribution or payment of any kind whatsoever that I made to the "Phil Gramm for Senate" campaign.

G. W. Sanford
G. W. SANFORD

Subscribed and sworn to before me this 20th day of November 1984.

Kenneth Geister
Notary Public
State of Texas

8904074485

MR. OR MRS. G. W. SANFORD
1803 DENTON DR. 242-5928
CARROLLTON, TEXAS 75006

10-1 1984 6608

Pay to the order of Phil Gramm for Senate $ 1000.00

One thousand dollars & no/100 Dollars

InterFirst
InterFirst Bank Carrollton
Box 38 • Carrollton, Texas 75006

Memo

G. W. Sanford

⑆111922307⑆ ⑈13 0014 4⑈ 6608 ⑈0000100000⑈

MR. OR MRS. G. W. SANFORD
1803 DENTON DR. 242-5928
CARROLLTON, TEXAS 75006

10-1 1984 6606

Pay to the order of Phil Gramm for Senate $ 1000.00

One thousand dollars & no/100 Dollars

InterFirst
InterFirst Bank Carrollton
Box 38 • Carrollton, Texas 75006

Memo

Mrs. G. W. Sanford

⑆111922307⑆ ⑈13 0014 4⑈ 6606 ⑈0000100000⑈

8 9 0 4 0 7 4 4 8 6 7

8 9 0 4 0 7 4 4 8 6 8

PAY TO THE ORDER OF

PAY TO THE ORDER OF

D.C. CORP.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1984

Robert Brager, Esquire
Beveridge & Diamond, P.C.
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1837
Louis Beecherl, Jr.
Anne Pickens
Paige Pickens

Dear Mr. Brager:

This is in response to your letter dated November 13, 1984, requesting an extension of time in the above matter. We have considered the reasons as set forth as the basis of your request and have decided to grant the extension. Accordingly, your responses will be due on December 5, 1984.

If you have any questions, please feel free to contact Patty Reilly, the staff member assigned to this case at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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RECEIVED AT THE FEC
GCC#5750
84 NOV 21 P 5:04

BEFORE THE FEDERAL ELECTION COMMISSION

DONNA MOBLEY, Complainant

v. CASE NO. MUR-1837

PHIL GRAMM et al., Respondents

RESPONSE OF AMERICAN FAMILY PAC

COMES NOW, American Family PAC (hereinafter "Respondent" or "the PAC"), and files this Response to the Complaint in the above-titled matter. Respondent received notice of this Complaint on November 8, 1984. See Exhibit 1. Thus, this Response is timely filed within the 15-day statutory limit.

1. The American Family PAC is a Political Action Committee formed in accordance with the requirements of Federal law and regulations for "multi-candidate committees" (see 2 U.S.C. §441(a)(2)). Respondent is located in Columbus, Georgia, where its regular meetings take place.

2. Each meeting of the PAC is reflected in minutes which state the date of the meeting, identify the amounts of contributions to be made to specific political campaign committees, and indicate the particular election or elections for which each such contribution is intended. This information is also included in the periodic reports filed by the PAC with the Federal Election Commission pursuant to the requirements of Federal law and regulations.

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3. According to the PAC's minutes of its meeting of July 6, 1984, Exhibit 2, at that meeting a contribution of $2,000 was designated to be made to the Phil Gramm campaign committee for payment of expenses of the Texas Senate Republican primary. The contribution was designated for the primary on the face of the check sent to the Gramm campaign committee. See Exhibit 3.

4. In designating this $2,000 contribution for the Gramm primary election, the PAC and its members were at all times under the belief that the Gramm campaign had expense obligations remaining after the date of the primary (May 5, 1984). This belief was confirmed by the fact that, after receiving the $2,000.00 check specifically labelled "PRIMARY" and cashing it July 18 (see Exhibit 3), the Gramm committee did not return the check or communicate with the PAC to indicate that the committee did not have post-primary debts.

5. Complainant has charged that Respondent and other contributors to the Gramm campaign have violated 11 CFR §110.1 (a)(2), based on the allegation that the Gramm campaign did not sustain debts from the primary election which were outstanding after that election, and therefore contributions made after May 5, 1984 could not be made to defray such debts. The basis of Complainant's allegation is the Gramm campaign's consolidated July 15, 1984 report for both its primary and general election campaigns, which indicates cash-on-hand of approximately $39,000. However, because it was consolidated, this report

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cannot serve as evidence of whether or not the primary campaign had debts outstanding after the date of the primary.

6. The Gramm campaign did have debts outstanding following the date of the primary. Evidence of these debts is a series of disbursements made for primary expenses, after the date of the primary, and so designated on the Schedules of Disbursements filed with Gramm's July 15 and October 15 quarterly reports. Exhibit 4. "The determination of net debts outstanding does not require that the committee have a zero cash balance on the date of the primary election. The calculation of total debts and obligations attributable to the primary election includes ... primary election expenses incurred but not paid." FEC Advisory Opinion AO 1984-32, CCH Fed. Election Guide ¶5777 (August 17, 1984).

7. The amount of these post-primary disbursements well exceeded the $2,000 contribution made by Respondent for debts outstanding after the primary election and the approximately $39,000 reported as consolidated cash-on-hand in the Gramm July 15 report. Thus, Respondent was not in violation of 11 CFR §110.1(a)(2)(i) in making the $2,000 contribution.

8. On September 7, 1984, the American Family PAC held a meeting in which the sum of $5,000 was allocated as a contribution to the Phil Gramm campaign and specifically designated in writing for the general election. See Exhibit 5. The amount of this contribution does not exceed the ceiling established in 11 C.F.R §110.2 (a)(1) for campaign contributions "to any

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election". In allocating for the general election the maximum permissible sum of $5,000, the PAC relied on the fact that the previous $2,000 contribution labelled "primary" had not been returned by the Gramm campaign or otherwise occasioned communication from the campaign to the PAC.

9. For purposes of the Federal election regulations, the phrase "with respect to any election" means "in the case of a contribution designated in writing for a particular election, the election so designated . . ." 11 C.F.R. §110.1(a)(2)(i). Since Respondent made a contribution of $2,000 specifically designated for the Phil Gramm primary election (in compliance with the further requirements stated in §110.1 (a)(2)(i)), and a contribution of $5,000 specifically designated for the Phil Gramm general election, and since these were the only contributions made by Respondent to the Phil Gramm campaign for the 1984 Texas Senate race, Respondent has complied with the requirement of 11 C.F.R. §110.2 (a)(1) that "no multi-candidate political committee shall make contributions [t]o any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000".

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10. In short, Respondent has in no way violated any of the Federal election laws or regulations, and the Complaint's allegations as to Respondent should be dismissed.

Respectfully submitted,

Myles J. Ambrose
Christina W. Fleps

O'CONNOR & HANNAN
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, D.C. 20006

Counsel for American Family PAC

November 20, 1984

8904074374

RECEIVED
NOV 08 1984
COMPLIANCE DEPT

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1984

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

American Family PAC
Box 1480
Attn: John Amos
Columbus, GA 31902

RE: MUR 1837

Dear Mr. Amos:

This letter is to notify you that on October 30, 1984, the Federal Election Commission received a complaint which alleges that American Family PAC violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1837. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing, that no action should be taken against American Family PAC in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, American Family PAC will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

8904074487

EXHIBIT #1

A

MINUTES OF COMMITTEE

MEETING OF

AF-PAC

I, Salvador Diaz-Verson, the undersigned Secretary, duly authorized by the By-Laws of American Family Political Action Committee "AF-PAC", as adopted on January 20, 1976, do hereby certify that a meeting of said Committee was held on July 6, 1984, at which meeting by unanimous vote of the members thereof, there was duly adopted the following resolution:

Resolved, that contributions be made to the following committees for said purpose:

Phil Gramm	$2,000.00	Campaign Expense-Primary
Andy Ireland	250.00	Campaign Expense-Primary
John Glenn	2,500.00	Debt Retirement Pres. Campaign

IN WITNESS WHEREOF, I have hereunto set my hand as Secretary this 6 day of July, 19 84.

Salvador Diaz-Verson

EXHIBIT #2

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for LINE NUMBER 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

AMERICAN FAMILY CORPORATION POLITICAL ACTION COMMITTEE c00034157

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Friends of Phil Gramm 5555 North Lamar, Suite H109 Austin, Texas 78751	Federal Campaign Expense Disbursement for: XX Primary ☐ General ☐ Other (specify):	7-06-84	2,000.00
B. Full Name, Mailing Address and ZIP Code Andy Ireland Campaign Committee P.O. Box 550 Winter Haven, Florida 33880	Federal Campaign Expense Disbursement for: XX Primary ☐ General ☐ Other (specify):	7-06-84	250.00
C. Full Name, Mailing Address and ZIP Code John Glenn Presidential Committee 444 N. Capitol St., Suite 407 Washington, D.C. 20001	Federal Campaign Expense Disbursement for: ☐ Primary ☐ General XX Other (specify): Debt Retirement	7-06-84	2,500.00
D. Full Name, Mailing Address and ZIP Code Mack Mattingly Re-Election Cmte. P.O. Box 1986 Brunswick, Georgia 31520	Federal Campaign Expense Disbursement for: XX Primary ☐ General ☐ Other (specify):	7-10-84	500.00
E. Full Name, Mailing Address and ZIP Code Dole for Senate (Robert) 919 Prince Street Alexandria, Virginia 22314	Federal Campaign Expense Disbursement for: ☐ Primary XX General ☐ Other (specify):	7-23-84	4,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			9,250.00
TOTAL This Period (last page this line number only)			9,250.00

8900407487

EXHIBIT #3

AMERICAN FAMILY POLITICAL
ACTION COMMITTEE
P. O. BOX 1460
COLUMBUS, GA 31902

28267 1087

July 6, 19 84 61-26 651

PAY TO THE ORDER OF Friends of Phil Gramm $ 2,000.00

----------Two Thousand and 00/100---------- DOLLARS

FIRST NATIONAL BANK
MOBILE ALABAMA

FOR Federal Campaign Expense-PRIMARY

"001087" ⑆065100262⑆ 13 911 41" "0000200000"

Pay to the Order of
First City National Bank
of Bryan, Texas
Friends of Phil Gramm
#00-4282-7

JY '84 18
FIRST NATIONAL BANK
MOBILE, ALABAMA
PAY ANY BANK

JY '84 18
PAID
FIRST NATIONAL BANK
MOBILE ALABAMA

JY '84 18
FIRST COMPANY BANK
ATLANTA, GEORGIA
PAY ANY BANK

8904074448878

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (In Full)

Friends of Phil Gramm

A. Full Name, Mailing Address and ZIP Code Aaron Office Furniture 4512 McEwen Road Dallas, TX 75[illegible]	Purpose of Disbursement Office furniture rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/16/84	Amount of Each Disbursement This Period $ 57.00
B. Full Name, Mailing Address and ZIP Code Aaron Office Furniture (continued)	Purpose of Disbursement Office furniture rental Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/30/84	Amount of Each Disbursement This Period 62.00
C. Full Name, Mailing Address and ZIP Code Ace Furnace 1960 W. Northwest Highway Dallas, TX 75220	Purpose of Disbursement Mechanical repair Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/4/84	Amount of Each Disbursement This Period 237.32
D. Full Name, Mailing Address and ZIP Code Ailes Communications, Inc. 436 W. 43rd St. New York, N.Y. 10036	Purpose of Disbursement Media services Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 5/1/84	Amount of Each Disbursement This Period 13,600.00 15,500.00
E. Full Name, Mailing Address and ZIP Code Ailes Communications, Inc. (continued)	Purpose of Disbursement Media services Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/11/84	Amount of Each Disbursement This Period 7,125.00
F. Full Name, Mailing Address and ZIP Code Air One, Inc. 4433 Woodson Rd. St. Louis, Mo 63134	Purpose of Disbursement Air travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/25/84	Amount of Each Disbursement This Period 1,149.00
G. Full Name, Mailing Address and ZIP Code American Airlines P. O. Box 51940, Maildrop 386 Tulsa, OK 74151	Purpose of Disbursement Air travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/2/84 6/20/84	Amount of Each Disbursement This Period 1,208.00 71.00
H. Full Name, Mailing Address and ZIP Code American Airlines (cont'd)	Purpose of Disbursement Air travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/25/84	Amount of Each Disbursement This Period 182.00
I. Full Name, Mailing Address and ZIP Code Americana Hotel 200 Main Street Ft. Worth, TX 76102	Purpose of Disbursement Fund raiser Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/25/84	Amount of Each Disbursement This Period 6,293.81
SUBTOTAL of Disbursements This Page (optional)			45,545.13
TOTAL This Period (last page this line number only)			

EXHIBIT #4

SCHEDULE B

ITEMIZED DISBURSEMENTS

[illegible] category of the [illegible] Summary Page

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Name of Committee (in Full)

Friends of Phil Gramm

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. AMPAC HOTEL P. O. Box 6[illegible] Dallas/Ft. Worth Airport 75261	Rally Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/3/84	760.00
B. AMPAC Hotel (continued)	Lodging Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/20/84	91.80
C. Arlin Development Co. 2355 Stemmons, Suite 503 Dallas, TX 75207	Accounting service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/1/84	2,000.00
D. Lorie J. Arnett 1803 Eastwood Houston, TX 77023	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/27/84	275.45
E. Aspen Custom Photo Service 926 Pennsylvania Ave., S.E. Washington, D. C.	Photographic service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84	699.60
F. AT&T Info. Systems 1033 La Pasada, #240 Austin, TX 78752	Telephone service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 4/23/84 5/1/84 6/[illegible]/84	633.60 176.40 68.62 [illegible]
G. AT&T Info. Systems 1033 La Pasada, #240 Austin, TX 78752	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/20/84	352.80
H. Bethesda Engravers 5801 Erdman Ave. Baltimore, MD 21205	Printing service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/22/84	494.75
I. Black, Manafort & Stone 324 N. Fairfax Alexandria, VA 22314	Media Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 4/18/84 4/24/84 4/26/84	31,000.00 166,000.00 110,000.00 118,000.00
SUBTOTAL of Disbursements This Page (optional)			431,059.81
TOTAL This Period (last page this line number only)			

SCHEDULE F

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Name of Committee (in Full)

Friends of Phil Gramm

A. Full Name, Mailing Address and ZIP Code Black, Manafort & Stone 324 N. Fairfax Alexandria, VA 22314	Purpose of Disbursement Media Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/7/84	Amount of Each Disbursement This Period 150,000.00
B. Full Name, Mailing Address and ZIP Code Black, Manafort & Stone 324 N. Fairfax Alexandria, VA 22314	Purpose of Disbursement Media Disbursement for ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/14/84 5/17/84 6/14/84 6/28/84	Amount of Each Disbursement This Period 100,000.00 50,000.00 20,000.00 75,000.00
C. Full Name, Mailing Address and ZIP Code Black, Manafort & Stone 324 N. Fairfax Alexandria, VA 22314	Purpose of Disbursement Consulting fee Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 6/22/84	Amount of Each Disbursement This Period 5,000.00 5,000.00
D. Full Name, Mailing Address and ZIP Code Black, Manafort & Stone (cont'd)	Purpose of Disbursement Reimburse for telephone expense Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/22/84	Amount of Each Disbursement This Period 346.59
E. Full Name, Mailing Address and ZIP Code Black, Manafort & Stone (cont'd)	Purpose of Disbursement Reimburse for travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84	Amount of Each Disbursement This Period 1,062.37
F. Full Name, Mailing Address and ZIP Code Black, Manafort & Stone (cont'd)	Purpose of Disbursement Reimburse for shipping Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 6/22/84	Amount of Each Disbursement This Period 128.70 75.40
G. Full Name, Mailing Address and ZIP Code Pat Black 6127 Sanford Houston, TX 77096	Purpose of Disbursement Consulting fee Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/30/84 5/14/84	Amount of Each Disbursement This Period 1,500.00 1,500.00
H. Full Name, Mailing Address and ZIP Code Pat Black 6127 Sanford Houston, TX 77096	Purpose of Disbursement Consulting fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84 6/14/84 6/28/84	Amount of Each Disbursement This Period 1,500.00 1,500.00 1,500.00
I. Full Name, Mailing Address and ZIP Code Pat Black (continued)	Purpose of Disbursement Office supplies Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84 5/1/84 5/14/84	Amount of Each Disbursement This Period 21.65 60.40 8.50
SUBTOTAL of Disbursements This Page (optional)			415,703.81
TOTAL This Period (last page this line number only)			

SCHEDULE B — ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

Friends of Phil Gramm

A. Full Name, Mailing Address and ZIP Code Pat Black 6127 Sanford Houston, TX 77096	Purpose of Disbursement Reimburse for rally exp. Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 4/23/84 5/14/84	Amount of Each Disbursement This Period 111.70 567.20
B. Full Name, Mailing Address and ZIP Code Pat Black (continued)	Purpose of Disbursement Travel Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 4/23/84 5/1/84	Amount of Each Disbursement This Period 25.00 12.82
C. Full Name, Mailing Address and ZIP Code Pat Black (continued)	Purpose of Disbursement Reimburse for postage Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 4/23/84 5/14/84	Amount of Each Disbursement This Period 203.50 200.00
D. Full Name, Mailing Address and ZIP Code Pat Black (continued)	Purpose of Disbursement Reimburse for yard signs Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 5/1/84	Amount of Each Disbursement This Period 245.57
E. Full Name, Mailing Address and ZIP Code Bonneville Satellite Corp. 165 Social Hall Ave. Salt Lake City, Utah 84111	Purpose of Disbursement Media services Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 6/14/84	Amount of Each Disbursement This Period 260.00
F. Full Name, Mailing Address and ZIP Code Gerda Brandes 4514 Duquesne Drive San Antonio, TX 78229	Purpose of Disbursement Salary Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 4/16/84 4/30/84 5/14/84	Amount of Each Disbursement This Period 88.20 88.20 88.20
G. Full Name, Mailing Address and ZIP Code Bryan-College Station Eagle 1729 Briarcrest Dr. Bryan, TX 77805	Purpose of Disbursement Advertisement Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 4/30/84	Amount of Each Disbursement This Period 249.00
H. Full Name, Mailing Address and ZIP Code CAMPAC Systems Corp. 2000 M Street, N. W., #560 Washington, D. C. 20036	Purpose of Disbursement Computer services Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 4/18/84 5/21/84 5/31/84	Amount of Each Disbursement This Period 2,054.80 8,400.00 30,000.00
I. Full Name, Mailing Address and ZIP Code CAMPAC Systems Corp. (cont'd)	Purpose of Disbursement Computer services Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 6/6/84 6/12/84	Amount of Each Disbursement This Period 10,000.00 24,189.42
SUBTOTAL of Disbursements This Page (optional)			76,723.61
TOTAL This Period (last page this line number only)			

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SCHEDULE B

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Name of Committee (in Full)
Friends of Phil Gramm

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. CAMBACK Systems Corp. (cont'd)	Computer services Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/21/84	$5,000.00
B. Capitol Hill Club 300 First St., S.E. Washington, D. C. 20003	Steering Comm. Luncheon Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/31/84 6/14/84	216.00 3.24
C. Carpet Services, Inc. 2451 Stemmons Freeway Dallas, TX 75207	Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/7/84	1,250.00
D. Carpet Services, Inc. (cont'd)	Rent Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/5/84	1,250.00
E. Leonard Carpenter c/o Russ Kent Realtor 1144 Duncanville Rd. Duncanville, TX 75116	Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/7/84	259.00
F. Century Aircraft Corp. P. O. Box 31026 Amarillo, TX 79120	Airplane charter Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/12/84	1,737.00
G. City Club of San Antonio 6243 IH 10, Suite 1000 San Antonio, TX 78205	Fundraiser expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84	1,377.74
H. Continental Airlines 2929 Allan Parkway Houston, TX 77210-4607	Air travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/20/84 5/3/84	244.00 308.00
I. Continental Airlines (cont'd)	Air travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/4/84	1,470.00
SUBTOTAL of Disbursements This Page (optional)			13,114.98
TOTAL This Period (last page this line number only)			

SCHEDULE B

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Name of Committee (in Full)

Friends of Phil Gramm

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Audrey Corbett Route 1, Box 15 Salado, TX 76571	Reimburse for fundraiser Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84	5,246.01
B. Corporate Services 1055 Conrad Sawer Houston, TX 77043	Mailings Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/19/84	7,000.00
C. Corsicana Sun 405 E. Collin Corsicana, TX 75110	Advertisement Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 4/30/84	100.80 207.57
D. C&P Telephone Co. 930 H Street, N. W. Washington, D. C. 20001	Telephone service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/21/84 6/21/84	187.48 20.37
E. Dorothy R. Curtis 2834 Whisper Fawn San Antonio, TX 78230	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/28/84	750.70
F. Cutter Beechcraft P. O. Box 26050 El Paso, TX 79926	Airplane Charter Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/30/84	295.50
G. Ruth Cymber 4406 Chesapeake St., N.W. Washington, D. C. 20016	Travel reimbursement Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/28/84 5/12/84	675.79 674.00
H. Floyd Dakil 7[illegible]6 W. Northwest Highway Dallas, TX 75225	Reimburse for fundraiser Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/30/84	5,000.00
I. Dallas Power & Light 1506 Commerce St. Dallas, TX 75201	Electric services Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84 6/28/84	181.72 89.19
SUBTOTAL of Disbursements This Page (optional)			20,429.13
TOTAL This Period (last page this line number only)			

Summary Page

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Name of Committee (in Full)

Friends of Phil Gramm

A. Full Name, Mailing Address and ZIP Code Delta Airlines 1800 N. Kent St., #1200 Arlington, VA 22203	Purpose of Disbursement Travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/4/84	Amount of Each Disbursement This Period 60.00
B. Full Name, Mailing Address and ZIP Code Delta Airlines (continued)	Purpose of Disbursement Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/25/84	Amount of Each Disbursement This Period 403.00
C. Full Name, Mailing Address and ZIP Code Dependable Printing, Inc. 707 Montgomery St. Alexandria, VA 22314	Purpose of Disbursement Printing services Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 6/14/84 6/22/84	Amount of Each Disbursement This Period 2,617.93 16,436.94 1,491.73
D. Full Name, Mailing Address and ZIP Code 1800 Plaza Partnership 1804 N. E. Loop, 410 San Antonio, TX 78217	Purpose of Disbursement Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/7/84	Amount of Each Disbursement This Period 1,199.80
E. Full Name, Mailing Address and ZIP Code 1800 Plaza Partnership (continued)	Purpose of Disbursement Rent Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/5/84	Amount of Each Disbursement This Period 760.20
F. Full Name, Mailing Address and ZIP Code Espanoza Printing Co. 1815 Young Street Dallas, TX 75201	Purpose of Disbursement Printing service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84 6/14/84	Amount of Each Disbursement This Period 1,909.40 968.84
G. Full Name, Mailing Address and ZIP Code Federal Express Corp. P. O. Box 727, Dept A Memphis, TN 38194	Purpose of Disbursement Shipping Expense Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2[illegible]/84 5/1[illegible]/84 5/7/84 5/16/84	Amount of Each Disbursement This Period [illegible] [illegible] [illegible] 105.00
H. Full Name, Mailing Address and ZIP Code Federal Express Corp. (continued)	Purpose of Disbursement Shipping Expense Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/4/84 6/5/84 6/14/84	Amount of Each Disbursement This Period 462.50 72.50 49.00
I. Full Name, Mailing Address and ZIP Code First City National Bank of Bryan Drawer 913 Bryan, TX 77803	Purpose of Disbursement Service charges Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/6/84 5/31/84	Amount of Each Disbursement This Period 6,504.93 287.50
SUBTOTAL of Disbursements This Page (optional)			33,708.77
TOTAL This Period (last page this line number only)			

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Name of Committee (in Full)

Friends of Phil Gramm

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code First City Nat'l Bank of Bryan Drawer 913 Bryan, TX 77805	Service charges Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/6/84	1,400.68
B. Full Name, Mailing Address and ZIP Code General Telephone Co. of the Southwest P. O. Box 2933 Austin, TX 78769	Telephone service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/30/84 5/1/84 5/1/84 6/4/84	381.75 2,871.15 136.23 737.14
C. Full Name, Mailing Address and ZIP Code General Telephone Co. of the Southwest (cont'd)	Telephone service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/12/84 6/6/84	651.55 82.65
D. Full Name, Mailing Address and ZIP Code David Godfrey P. O. Box 3864 Midland, TX 79702	Fundraiser expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/4/84	2,572.85
E. Full Name, Mailing Address and ZIP Code Arthur Goldblum Investments 3100 Eastside Houston, TX 77098	Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/7/84	1,300.00
F. Full Name, Mailing Address and ZIP Code Arthur Goldblum Investments 3100 Eastside Houston, TX 77098	Rent Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/5/84	1,300.00
G. Full Name, Mailing Address and ZIP Code Perrin Corp. 8701 Mopac Blvd. Austin, TX 78759	Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/7/84	796.00
H. Full Name, Mailing Address and ZIP Code Jeb Hensarling 711 Navarro, 9620 San Antonio, TX 78205	Reimburse travel Expense Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84	77.76
I. Full Name, Mailing Address and ZIP Code Jeb Hensarling (continued)	Consulting Fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/14/84 6/28/84	1,000.00 1,000.00
SUBTOTAL of Disbursements This Page (optional)			14,307.76
TOTAL This Period (last page this line number only)			

SCHEDULE B

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Name of Committee (in Full)

Friends of Phil Gramm

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Fred Harvey c/o Dean Rash 725 First City Nat'l Bank Bldg. El Paso, TX 79901-1379	Rent Disbursement for: ☒Primary ☐General ☐Other (specify):	5/7/84	300.00
B. Full Name, Mailing Address and ZIP Code Highland Park West, LTD JEL Investments, Inc. 1403 N. Sixth St. Austin, TX 78703	Rent Disbursement for: ☒Primary ☐General ☐Other (specify):	5/7/84	250.00
C. Full Name, Mailing Address and ZIP Code Carey Hobbs P. O. Box 151 Groesbeck, TX 76642	Airplane charter Disbursement for: ☒Primary ☐General ☐Other (specify):	5/1/84 6/12/84 6/22/84	377.50 11,264.00 6,230.00
D. Full Name, Mailing Address and ZIP Code Holden Business Machines 7108 Military Parkway Dallas, TX 75227	Typewriter rental Disbursement for: ☒Primary ☐General ☐Other (specify):	4/23/84	220.00
E. Full Name, Mailing Address and ZIP Code Holden Business Machines (cont'd)	Typewriter rental Disbursement for: ☐Primary ☒General ☐Other (specify):	6/20/84	130.00
F. Full Name, Mailing Address and ZIP Code Houston Marriott Hotel - West Loop 1750 W. Loop South Houston, TX 77027	Leadership meeting Disbursement for: ☒Primary ☐General ☐Other (specify):	5/16/84	231.72
G. Full Name, Mailing Address and ZIP Code Howard Johnson Interstate 40 at Georgia Amarillo, TX 79109	Lodging Disbursement for: ☒Primary ☐General ☐Other (specify):	4/30/84 6/4/84	88.30 109.70
H. Full Name, Mailing Address and ZIP Code Howard Johnson Interstate 30 Texarkana, TX 75503	Lodging Disbursement for: ☒Primary ☐General ☐Other (specify):	4/16/84 4/24/84	93.09 89.88
I. Full Name, Mailing Address and ZIP Code Elizabeth S. Burley 1620 Waterston, #202 Austin, TX 78703	Salary Disbursement for: ☒Primary ☐General ☐Other (specify):	4/16/84 4/30/84 5/14/84	937.80 937.80 937.80
SUBTOTAL of Disbursements This Page (optional)			22,208.59
TOTAL This Period (last page this line number only)			

SCHEDULE B — ITEMIZED DISBURSEMENTS

(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

Friends of Phil Gramm

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Elizabeth S. Hurley 1620 Waterston, #202 Austin, TX 78703	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	5/31/84 6/14/84 6/28/84	937.80 937.80 937.80
B. Full Name, Mailing Address and ZIP Code Elizabeth S.Hurley 1620 Waterston, #202 Austin, TX 78703	Purpose of Disbursement Reimburse travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 4/23/84 5/14/84	Amount of Each Disbursement This Period 274.20 10.62 157.46
C. Full Name, Mailing Address and ZIP Code Elizabeth S. Hurley (continued)	Purpose of Disbursement Shipping and office supplies Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84 4/30/84 5/14/84	Amount of Each Disbursement This Period 350.70 20.85 63.15
D. Full Name, Mailing Address and ZIP Code IBM Corporation 2727 LBJ Freeway Dallas, TX75234	Purpose of Disbursement Data Processing Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/17/84 6/22/84 6/29/84	Amount of Each Disbursement This Period 20,442.00 58,184.00 28,792.00
E. Full Name, Mailing Address and ZIP Code Granville Gruhar P. O. box 1776 Lynchburg, VA 24505	Purpose of Disbursement Mailings Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 6/22/84	Amount of Each Disbursement This Period 1,708.19 1,242.00
F. Full Name, Mailing Address and ZIP Code Michalyn J. Jones 4205 Dauphine Austin, TX 78726	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 4/30/84 5/13/84	Amount of Each Disbursement This Period 436.65 436.65 436.65
G. Full Name, Mailing Address and ZIP Code Michalyn J. Jones 4205 Dauphine Austin, TX 78726	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84 6/14/84 6/28/84	Amount of Each Disbursement This Period 436.65 436.65 436.65
H. Full Name, Mailing Address and ZIP Code Michalyn J. Jones (continued)	Purpose of Disbursement Office supplies & shipping Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84 4/30/84 5/14/84 5/16/84	Amount of Each Disbursement This Period 81.27 66.07 84.73 87.16
I. Full Name, Mailing Address and ZIP Code Michalyn J. Jones (continued)	Purpose of Disbursement Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 78.95
SUBTOTAL of Disbursements This Page (optional)			117,022.95
TOTAL This Period (last page this line number only)			

SCHEDULE I

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

Name of Committee (in Full)

Friends of Phil Gramm

A. Full Name, Mailing Address and ZIP Code Michilyn J. Jones (continued)	Purpose of Disbursement Travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/14/84	Amount of Each Disbursement This Period 59.09
C. Full Name, Mailing Address and ZIP Code Jeannette A. Kelley 6106 Vance Jackson, D-16 San Antonio, TX 78230	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 4/30/84 5/14/84	Amount of Each Disbursement This Period 128.95 128.95 128.95
C. Full Name, Mailing Address and ZIP Code Jeannette A. Kelley (continued)	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/31/84	Amount of Each Disbursement This Period 128.95
D. Full Name, Mailing Address and ZIP Code Jack Kemp 2252 Rayburn Office Bldg. Washington, D. C. 20515	Purpose of Disbursement Reimburse for travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/14/84	Amount of Each Disbursement This Period 458.00
E. Full Name, Mailing Address and ZIP Code Karen R. Kitterman 5750 Marquita, #5 Dallas, TX 75206	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84 6/14/84 6/28/84	Amount of Each Disbursement This Period 117.39 558.45 558.45
F. Full Name, Mailing Address and ZIP Code Yvonne L. Kohutek 13123 Country Trail San Antonio, TX 78216	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 4/30/84 5/14/84	Amount of Each Disbursement This Period 215.85 215.85 215.85
G. Full Name, Mailing Address and ZIP Code Yvonne L. Kohutek (continued)	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84 6/14/84 6/28/84	Amount of Each Disbursement This Period 215.85 215.85 215.85
H. Full Name, Mailing Address and ZIP Code Yvonne Kohutek (continued)	Purpose of Disbursement Food, rentals for rallys Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84 5/14/84 6/4/84	Amount of Each Disbursement This Period 1,307.21 51.35 53.02
I. Full Name, Mailing Address and ZIP Code Yvonne Kohutek (continued)	Purpose of Disbursement Fundraiser Expenses Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/5/84	Amount of Each Disbursement This Period 126.68
SUBTOTAL of Disbursements This Page (optional)			5,101.44
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

Friends of Phil Gramm

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Yvonne Kohutek (continued)	Office supplies & shipping Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84 5/14/84	75.11 24.00
B. Yvonne L. Kohutek (continued)	Yard signs stobs Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84 5/1/84	51.11 34.08
C. Yvonne Kohutek (continued)	Telephone reimbursement Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84	65.43
D. Yvonne L. Kohutek (continued)	Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/1/84	120.00
E. Kwik-Kopy 4620 50th St. Lubbock, TX 79414	Photostatic service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/16/84	277.74
F. Thomas J. Lankford, Inc. P. O. Box 1504 Washington, D. C. 20013-1504	Printing service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 6/22/84	85.00 546.95
G. Lake Printing P. O. Box 1077 Greenville, TX 75401	Printing service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84	220.01
H. Loews Anatole Hotel 2201 Stemmons Dallas, TX 75207	Fundraiser expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/1/84 5/14/84	21,239.14 47.70
I. Luce Press Clipping Service Box 379 Topeka, KS 66601	Media services Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84 6/4/84	593.85 700.58
SUBTOTAL of Disbursements This Page (optional)			24,080.70
TOTAL This Period (last page this line number only)			

SCHEDULE E — ITEMIZED DISBURSEMENTS — (Use separate Schedule for each category of the Detailed Summary Page)

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

Name of Committee (in Full): Friends of Phil Gramm

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Richard McBride 555 N. Lamar, R-109 Austin, TX 78751	Travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 4/23/84 5/1/84 5/[illegible]	471.83 677.32 319.44 6[illegible]
B. Richard McBride (continued)	Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84 5/1/84	100.00 200.00
C. Richard McBride (continued)	Fundraiser expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/30/84 5/14/84	1,772.66 236.25
D. Richard McBride (continued)	Office supplies & shipping Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 4/23/84 5/1/84	16.78 106.20 5.19
E. Dot McCalpin 2203 Ridge Crest Richardson, TX 75080	Rally supplies & shipping charges Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/1/84 6/4/84	35.00 215.45
F. Dot McCalpin (continued)	Travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/4/84	374.75
G. Dot McCalpin 2203 Ridge Crest Richardson, TX 75080	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 4/30/84 5/14/85	509.30 509.30 509.30
H. Market Opinion Research 550 Washington Blvd. Detroit, Michigan 48226	Travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/22/84	389.00
I. Market Opinion Research (cont'd)	Phone lists & shipping charges Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84 6/22/84	82.96 5,223.35
SUBTOTAL of Disbursements This Page (optional)			12,363.80
TOTAL This Period (last page this line number only)			

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SCHEDULE B — ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

Friends of Phil Gramm

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Jack Markham 1500 Broadway, Suite 1212 Lubbock, TX 79401	Fundraiser expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/1/84	1,56[illegible].19
B. Full Name, Mailing Address and ZIP Code Miller, Canfield, Paddock & Stone 1015 15th St., N. W., #1200 Washington, D. C. 20005	Purpose of Disbursement Legal services Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/1/84 6/22/84	8,568.72 6,890.37
C. Full Name, Mailing Address and ZIP Code Mitchell & Associates, Inc. 800 West Ave., Bldg. B Austin, TX 78701	Purpose of Disbursement Printing services Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	5/31/84	2,425.50
D. Full Name, Mailing Address and ZIP Code Monroe Box 9000R Morristown, NJ 07960	Purpose of Disbursement Copier rental & supplies Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/16/84	784.65
E. Full Name, Mailing Address and ZIP Code Monroe Systems for Business 950 W. Mockingbird Lane Dallas, TX 75247	Purpose of Disbursement Copier rental & supplies Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/13/84 4/23/84 5/1/84 6/12/84	159.60 414.89 252.39 143.1[illegible]
F. Full Name, Mailing Address and ZIP Code Morgan Equipment Co. P. O. Box 7802 San Francisco, CA 94120	Purpose of Disbursement Airplane charter Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/7/84	2,324.43
G. Full Name, Mailing Address and ZIP Code Navarro College P. O. Box 1170 Corsicana, TX 75110	Purpose of Disbursement Food, travel for band Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 4/23/84	208.95 35.00
H. Full Name, Mailing Address and ZIP Code Lawrence A. Neal 118 S. Pershing Arlington, VA 22204	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 4/30/84	1,193.34 1,193.34
I. Full Name, Mailing Address and ZIP Code Loy Norris 245 S. W. Dian Burleson, TX 76028	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 4/30/84 5/14/84	250.00 250.00 250.00
SUBTOTAL of Disbursements This Page (optional)			26,905.72
TOTAL This Period (last page this line number only)			

SCHEDULE B — ITEMIZED DISBURSEMENTS — (carry forward)

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Name of Committee (in Full)

Friends of Phil Gramm

	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Loy Norris (continued)	Salary Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	5/31/84 6/14/84 6/28/84	250.00 250.00 250.00
B. Full Name, Mailing Address and ZIP Code Loy Norris (continued)	Purpose of Disbursement: Travel expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	4/23/84 6/22/84	46.39 156.32
C. Full Name, Mailing Address and ZIP Code Oak Cliff Tribune P. O. Box 24363 Dallas, TX 75224	Purpose of Disbursement: Advertisement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	4/30/84 5/16/84 6/22/84	336.00 50.00 497.00
D. Full Name, Mailing Address and ZIP Code Northwest Airlines Minneapolis/St. Paul Int'l Airport St. Paul, Minn. 55111	Purpose of Disbursement: Travel Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	6/4/84	234.00
E. Full Name, Mailing Address and ZIP Code P/M Consulting 202 E. Street, N.E. Washington, D. C. 20002	Purpose of Disbursement: Fundraisers expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	4/16/84 5/7/84 6/4/84 6/8/84	12,730.00 23,246.99 11,274.67 3,858.33
F. Full Name, Mailing Address and ZIP Code P/M Consulting (continued)	Purpose of Disbursement: Fundraising Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	6/4/84 5/7/84 6/8/84	3,725.13 2,041.83 5,343.09
G. Full Name, Mailing Address and ZIP Code Praxis List Co. P. O. Box 2352 Austin, TX 78768	Purpose of Disbursement: List service Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	4/23/84 5/7/84 5/16/84 6/12/84	1,582.95 1,501.15 250.50 4,028.65
H. Full Name, Mailing Address and ZIP Code Preferred Lists, Inc. 409 S. Capitol St., #104 Washington, D. C. 20003	Purpose of Disbursement: Mailing lists Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	4/23/84	3,756.57
I. Full Name, Mailing Address and ZIP Code Prestonwood Development Corp. 2001 Bryan Tower, 30th Floor Dallas, TX 75201	Purpose of Disbursement: Rent Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	5/7/84	350.00
SUBTOTAL of Disbursements This Page (optional)			75,902.07
TOTAL This Period (last page this line number only)			

SCHEDULE B

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Name of Committee (in Full)

Friends of Phil Gramm

A. Full Name, Mailing Address and ZIP Code P S Business Park 555 N. Lamar Austin, TX 78751	Purpose of Disbursement Rent Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/5/84	Amount of Each Disbursement This Period 814.37
B. Full Name, Mailing Address and ZIP Code Rancho Viejo 2219 S. Whitehouse Harlingen, TX 78550	Purpose of Disbursement Fundraiser expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/1/84 6/4/84	Amount of Each Disbursement This Period 1,230.00 37.50
C. Full Name, Mailing Address and ZIP Code Carol Reed Associates 2506 McKinney, Suite A Dallas, TX 75201	Purpose of Disbursement Consulting fee Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 4/30/84 5/14/84	Amount of Each Disbursement This Period 1,500.00 1,500.00 1,500.00
D. Full Name, Mailing Address and ZIP Code Carol Reed Associates (continued)	Purpose of Disbursement Consulting fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84 6/14/84 6/28/84	Amount of Each Disbursement This Period 1,500.00 1,500.00 1,500.00
E. Full Name, Mailing Address and ZIP Code Carol Reed Associates (continued)	Purpose of Disbursement Office supplies & shipping Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 4/16/84	Amount of Each Disbursement This Period 42.50 50.00
F. Full Name, Mailing Address and ZIP Code Carol Reed Associates (continued)	Purpose of Disbursement Reimbursement for phone calls Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84	Amount of Each Disbursement This Period 58.72
G. Full Name, Mailing Address and ZIP Code Republican Party of Texas 1300 Guadalupe, #205 Austin, TX 78701	Purpose of Disbursement Lists and Labels Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/26/84 6/4/84	Amount of Each Disbursement This Period 527.30 700.00
H. Full Name, Mailing Address and ZIP Code Republican Party of Texas (cont'd)	Purpose of Disbursement Room Deposit Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/28/84	Amount of Each Disbursement This Period 300.00
I. Full Name, Mailing Address and ZIP Code RHM, Inc. P. O. Box 4 RoundRock, TX 78664	Purpose of Disbursement Consulting fees Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 4/30/84 5/14/84	Amount of Each Disbursement This Period 3,000.00 3,000.00 3,000.00
SUBTOTAL of Disbursements This Page (optional)			21,760.39
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED Disbursements

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Name of Committee (In Full)

Friends of Phil Gramm

A. Full Name, Mailing Address and ZIP Code RHM, Inc. P. O. Box 4 Round Rock, TX 78664	Purpose of Disbursement Consulting Fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/[illegible]/84 6/[illegible]/84 6/[illegible]/84	Amount of Each Disbursement This Period 3,000.00 3,000.00 3,000.00
B. Full Name, Mailing Address and ZIP Code Laurie Rich 6019 Ridgecrest, #207 Dallas, TX 75231	Purpose of Disbursement Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84 5/1/84	Amount of Each Disbursement This Period 15.20 74.51
C. Full Name, Mailing Address and ZIP Code Laurie Rich (continued)	Purpose of Disbursement Rally expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84 5/14/84	Amount of Each Disbursement This Period 45.96 97.69
D. Full Name, Mailing Address and ZIP Code Laurie Rich (continued)	Purpose of Disbursement Office supplies & shipping Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84 5/1/84	Amount of Each Disbursement This Period 24.70 24.95
E. Full Name, Mailing Address and ZIP Code Laurie Rich (continued)	Purpose of Disbursement Office supplies & postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84 6/28/84	Amount of Each Disbursement This Period 79.40 28.65 29.89
F. Full Name, Mailing Address and ZIP Code Laurie Rich (continued)	Purpose of Disbursement Rally expenses Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/28/84	Amount of Each Disbursement This Period 45.15
G. Full Name, Mailing Address and ZIP Code Laurie Rich (continued)	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 4/30/84 5/14/84	Amount of Each Disbursement This Period 411.80 411.80 411.80
H. Full Name, Mailing Address and ZIP Code Laurie Rich (continued)	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84 6/14/84 6/28/84	Amount of Each Disbursement This Period 411.80 411.80 411.80
I. Full Name, Mailing Address and ZIP Code Pete Rodriguez 2911 Woodmeadow Bryan, TX 77802	Purpose of Disbursement Rally expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/22/84	Amount of Each Disbursement This Period 300.00
			12,236.90
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

SCHEDULE B — ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

Friends of Phil Gramm

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Vic Rogers P. O. Box 1310 Beaumont, TX 7704	Fundraising expenses	5/1/84	810.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Karl Rove & Co. P. O. Box 1908 Austin, TX 78767	Mailings	4/23/84 4/24/84 5/1/84	27,052.38 42,850.00 5,437.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Karl Rove & Co. (continued)	Mailings	5/16/84 6/8/84 6/22/84	30,641.64 10,000.00 15,412.05
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Karl Rove & Co. (continued)	Mailings	4/23/84 6/4/84	1,451.47 15,000.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
San Antonio Marriott North 611 N.W. Loop 410 San Antonio, TX 78216	Rally expenses	5/1/84	791.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Sheraton Spindletop Inn P. O. Box 2712 Beaumont, TX 77706	Fundraiser expenses	5/16/84	1,279.34
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Bemis Smith 2451 Stemmons Freeway Dallas, TX 75207	Salary	4/16/84 4/30/84 5/14/84	911.55 911.55 911.55
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Bemis Smith (continued)	Salary	5/31/84 6/4/84 6/28/84	911.55 911.55 911.55
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Bemis Smith (continued)	Reimburse travel expenses	5/1/84 5/14/84	912.75 266.13
SUBTOTAL of Disbursements This Page (optional)			157,389.16
TOTAL This Period (last page this line number only)			

SCHEDULE B — ITEMIZED DISBURSEMENTS — (Use separate schedule for each category of the Detailed Summary Page)

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Name of Committee (in Full): Friends of Phil Gramm

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Bemis Smith (continued)	Reimburse on travel expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/[illegible]/84	854.34
B. Bemis Smith (continued)	Rally expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/14/84	325.54
C. Rich Sofinowski P. O. Box 511 San Angelo, TX 76902	Fundraiser expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/14/84	557.88
D. Southern Political Consulting 6900 Fannin, #222 Houston, TX 77030	Mailings Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/26/84 5/3/84	6,237.47 3,114.88
E. Southwest Airlines Love Field, P.O. Box 37611 Dallas, TX 75235	Airline travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/30/84	218.00
F. Southwestern Bell P. O. Box 1550 Houston, TX 77001	Telephone service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 5/7/84 5/1[illegible]/84	1,554.70 472.[illegible]6 1,[illegible]
G. Southwestern Bell P. O. Box 1550 Houston, TX 77001	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/20/84	357.58
H. Southwestern Bell P. O. Box 220012 Dallas, TX 75394	Telephone service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84 4/23/84 5/1/84 5/7/84	339.[illegible] 3,[illegible] 811.85 2,833.65
I. Southwestern Bell P. O. Box 220012 Dallas, TX 75394	Telephone service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/16/84	1,752.15
SUBTOTAL of Disbursements This Page (optional)			24,042.03
TOTAL This Period (last page this line number only)			

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SCHEDULE B

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

Name of Committee (in Full)

Friends of Phil Gramm

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Southwestern Bell P. O. Box 220012 Dallas, TX 75395	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	5/31/84 6/20/84 6/28/84	780.00 2,682.03 1,051.39
B. Full Name, Mailing Address and ZIP Code Southwestern Bell P. O. Box 90 San Antonio, TX 78287	Telephone service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/13/84 4/23/84 5/7/84 5/21/84	395.00 2,309.28 1,952.44 1,483.17
C. Full Name, Mailing Address and ZIP Code Southwestern Bell P. O. Box 90 San Antonio, TX 78287	Telephone service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/16/84 6/28/84	219.40 73.77
D. Full Name, Mailing Address and ZIP Code Southwestern Bell P. O. Box 90 San Antonio, TX 78287	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	6/20/84 6/28/84	613.97 623.11
E. Full Name, Mailing Address and ZIP Code Sun World Corp. 900 Magoffin P. O. Box 2000 El Paso, TX 79999	Phone-Bank Headquarters Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/16/84	1,042.54
F. Full Name, Mailing Address and ZIP Code V. Lance Tarrance & Associates 3845 West FM 1960, #400 Houston, TX 77068	Reimburse Travel expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/1/84	231.67
G. Full Name, Mailing Address and ZIP Code V. Lance Tarrance & Associates	Reimburse telephone exp. Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/1/84 5/16/84	243.60 392.00
H. Full Name, Mailing Address and ZIP Code Mary Teeple 4032 Balcones Dr. Austin, TX 78731	Fundraiser Expense Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	5/1/84	1,208.46
I. Full Name, Mailing Address and ZIP Code Texas Employment Commission Austin Texas 78778	State Unemployment Tax Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84	759.27
SUBTOTAL of Disbursements This Page (optional)			16,267.11
TOTAL This Period (last page this box number only)			

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Name of Committee (in Full)

Friends of Phil Gramm

A. Full Name, Mailing Address and ZIP Code Texas Press Service 1718 West Fifth Austin, TX 7870[illegible]	Purpose of Disbursement News clipping service Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84 6/ /84	Amount of Each Disbursement This Period 419.03 469.58
B. Full Name, Mailing Address and ZIP Code Trinity Banc Savings Assoc. 2355 Stemmons Dallas, TX 75207	Purpose of Disbursement FICA and FIT taxes Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/1/84	Amount of Each Disbursement This Period 6,855.39
C. Full Name, Mailing Address and ZIP Code Trinity Banc Savings (continued)	Purpose of Disbursement Unemployment tax Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 224.97
D. Full Name, Mailing Address and ZIP Code Trinity Banc Savings Assoc. (cont'd)	Purpose of Disbursement FICA and FIT taxes Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84 6/28/84	Amount of Each Disbursement This Period 3,701.81 3,600.62
E. Full Name, Mailing Address and Z. Code U. S. Postmaster Austin Texas	Purpose of Disbursement: Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 700.00
F. Full Name, Mailing Address and ZIP Code U. S. Postmaster Dallas Texas 75207	Purpose of Disbursement Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 460.00
G. Full Name, Mailing Address and ZIP Code U. S. Postmaster Dallas Texas 75207	Purpose of Disbursement Postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84 6/12/84	Amount of Each Disbursement This Period 500.00 500.00
H. Full Name, Mailing Address and ZIP Code U. S. Postmaster Dallas Texas 75207	Purpose of Disbursement Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/8/84 5/30/84 6/5/84	Amount of Each Disbursement This Period 200.00 1,000.00 200.00
I. Full Name, Mailing Address and ZIP Code U. S. Postmaster Dallas Texas 75207	Purpose of Disbursement Postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/28/84	Amount of Each Disbursement This Period 2,000.00
SUBTOTAL of Disbursements This Page (optional)			20,826.41
TOTAL This Period (last page this line number only)			

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Name of Committee (in Full)

Friends of Phil Gramm

A. Full Name, Mailing Address and ZIP Code Waller Insurance Agency 2355 Stemmons Freeway Dallas, TX 75207	Purpose of Disbursement Insurance Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/22/84	Amount of Each Disbursement This Period 1,954.69
B. Full Name, Mailing Address and ZIP Code Warden Stationers P. O. Box 10098-498 Austin, TX 78757	Purpose of Disbursement Typewriter rental & supplies Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84 5/16/84	Amount of Each Disbursement This Period 130.00 97.64
C. Full Name, Mailing Address and ZIP Code Warden Stationers (continued)	Purpose of Disbursement Typewriter rental Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/20/84	Amount of Each Disbursement This Period 260.00
D. Full Name, Mailing Address and ZIP Code Mary Jan Waters 4655 Wild Indigo, #289 Houston, TX 77027	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 4/30/84 5/14/84	Amount of Each Disbursement This Period 444.55 444.55 444.55
E. Full Name, Mailing Address and ZIP Code Mary Jan Waters (continued)	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84	Amount of Each Disbursement This Period 444.55
F. Full Name, Mailing Address and ZIP Code John Weaver 4326 Meadowbrook Bryan, Texas 77801	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/16/84 4/30/84 5/14/84	Amount of Each Disbursement This Period 345.65 345.65 345.65
G. Full Name, Mailing Address and ZIP Code John Weaver (continued)	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 5/31/84 6/14/84 6/28/84	Amount of Each Disbursement This Period 345.65 345.65 345.65
H. Full Name, Mailing Address and ZIP Code John Weaver (continued)	Purpose of Disbursement Reimburse travel Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/22/84	Amount of Each Disbursement This Period 522.24
I. Full Name, Mailing Address and ZIP Code John Weaver (continued)	Purpose of Disbursement Rally expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/22/84	Amount of Each Disbursement This Period 353.38
SUBTOTAL of Disbursements This Page (optional)			7,170.01
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (In Full)

Friends of Phil Gramm

	Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full	Western Co. of N. America Lincoln Ave. North, TX 76106	Airplane rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	5/1/84	1,880.00
B. Full	F. Wiles N. Monroe Street, Suite 60 Jacksonville, Florida 32202	Rally expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/22/84	1,696.59
C. Full	Wollock Coventry Lane in, TX 78155	Fundraiser expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/1/84 6/4/84	648.50 44.44
D. Full	Denver Wood N. E. Loop 410, Suite 030 Antonio, TX 78731	Furniture rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/16/84	341.00
E. Full		Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
F. Full		Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
G. Full		Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
H. Full		Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full		Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)				
TOTAL This Period (last page this line number only)				1,598,512.80

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code Allen M. Gentry 1114 Button Willow Cove San Antonio, TX 78213	Purpose of Disbursement Contribution refund (check incomplete) Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 6/ /84	Amount of Each Disbursement This Period $500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			$500.00

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SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER [redacted]
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Mr. and Mrs. M. L. Berry 9646 Paula Adive Corpus Christi, TX 78410	Contribution refund Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	7/25/84	$1,000.00
B. Full Name, Mailing Address and ZIP Code Tom J. Moore General Delivery Navasota, TX 77868	Contribution refund Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/17/84	300.00
C. Full Name, Mailing Address and ZIP Code Paul K. Herder 4202 Highway 90 East San Antonio, TX 78219	Contribution refund Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9/26/84	1,000.00
D. Full Name, Mailing Address and ZIP Code Mr. J. M. Samuel 3217 19th St. Lubbock, TX 79410	Contribution refund Disbursement for ☒ Primary ☐ General ☐ Other (specify)	7/16/84	400.00
E. Full Name, Mailing Address and ZIP Code Mrs. Maude S. Smith 519 Three Corners Drive Houston, TX 77024	Contribution refund Disbursement for ☒ Primary ☐ General ☐ Other (specify)	7/16/84	200.00
F. Full Name, Mailing Address and ZIP Code Mrs. Lonnie A. Pilgrim P. O. Box 93 Pittsburg, TX 57686	Contribution refund Disbursement for ☒ Primary ☐ General ☐ Other (specify)	7/16/84	1,000.00
G. Full Name, Mailing Address and ZIP Code Ebby Halliday Acers 5999 W. N.W. Highway Dallas, TX 75225	Contribution refund Disbursement for ☐ Primary ☒ General ☐ Other (specify)	9/28/84	1,000.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			$4,900.00
TOTAL This Period (last page this line number only)			

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SCHEDULE

Committee ...

Any information copied from ... or used by any person to the extent ... solicitation ... other than using the names and address of any political committee to solicit contributions from such committee.

(Name and address) Rep. Women of Hood County 41 Long Creek Granbury, TX 76048	(employer and occupation) Political Party Committee	(date) 8/27/84	$250.00
Received For GENERAL Election	Aggregate Year-To-Date:	$250.00	
(Name and address) Rep. Men Of Nacogdoches 113 N. Church Nacogdoches, TX 75961	(employer and occupation) Political Party Committee	(date) 7/26/84	$219.60
Received For GENERAL Election	Aggregate Year-To-Date:	$219.60	
(Name and address) San Antonio Republican Women 310 Oak Glenn San Antonio, TX 78209	(employer and occupation) Political Party Committee	(date) 8/06/84	$500.00
Received For GENERAL Election	Aggregate Year-To-Date:	$500.00	
(Name and address) Wilson County Rep. Party Box 302 La Vernia, TX 78121	(employer and occupation) Political Party Committee	(date) 9/20/84	$250.00
Received For GENERAL Election	Aggregate Year-To-Date:	$250.00	
(Name and address) Lakeway Area Republican Club 901 Biscayne Austin, TX 78734	(employer and occupation) Political Party Committee	(date) 7/23/84	$200.00
Received For GENERAL Election	Aggregate Year-To-Date:	$200.00	
(Name and address) Lake Highlands Republican Women's Club 10543 Brentwood Dr. Dallas, TX 75238	(employer and occupation) Political Party Committee	(date) 9/18/84	$99.00
Received For GENERAL Election	Aggregate Year-To-Date:	$99.00	
(Name and address) Republic Women's Club 1213 Westlake Rd. Cleburne, TX 76000	(employer and occupation) Political Party Committee	(date) 9/26/84	$500.00
Received For GENERAL Election	Aggregate Year-To-Date:	$500.00	
			$2,018.60
SUBTOTAL This Page			
Total This Period			

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(name and address) Republican Womens's Club Box 1272 Corsicana, TX 75110	(employer and occupation) Political Party Committee	(date) 9/26/84	$100.00
Received For GENERAL Election	Aggregate Year-To-Date:	$100.00	
(name and address) Lake Houston Area Republican 2515 Kings Forest Dr. Kingwood, TX 77339	(employer and occupation) Political Party Committee	(date) 9/27/84	$499.00
Received For GENERAL Election	Aggregate Year-To-Date:	$499.00	
(name and address) Republicans of Sam Houston Houston, TX 77341	(employer and occupation) Political Party Committee	(date) 9/25/84	$25.00
Received For GENERAL Election	Aggregate Year-To-Date:	$25.00	
(name and address) Republican Women of Yoakum Yoakum, TX 77995	(employer and occupation) Political Party Committee	(date) 8/27/84	$400.00
Received For GENERAL Election	Aggregate Year-To-Date:	$400.00	
(name and address)	(employer and occupation)	(date)	
Received For GENERAL Election	Aggregate Year-To-Date:		
(name and address)	(employer and occupation)	(date)	
Received For GENERAL Election	Aggregate Year-To-Date:		
(name and address)	(employer and occupation)	(date)	
Received For GENERAL Election	Aggregate Year-To-Date:		
SUBTOTAL This Page			$1,024.00
TOTAL This Period			$3,042.60

** Tax for Payments In Kind

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SCHEDULE B — ITEMIZED DISBURSEMENTS

(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Praxis List Co. P. O. Box 2352 Austin, TX 78768	Computer services Disbursement for ☒ Primary ☐ General ☐ Other (specify)	7/12/84	2,099.44
B. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Preferred Lists 499 S. Capitol St, #104 Washington, D. C. 20003	Mailing lists Disbursement for ☐ Primary ☒ General ☐ Other (specify)	8/10/84 9/11/84	20,274.16 367.09
C. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
D. Armstrong Printers c/o Barbara Krebs 405 Ripple Creek Houston, TX 77024	Printing Disbursement for ☐ Primary ☒ General ☐ Other (specify)	9/20/84	500.50
D. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
P S Business Park - Austin 5555 N. Lamar Austin, TX 78751	Rent Disbursement for ☐ Primary ☒ General ☐ Other (specify)	7/3/84 7/12/84 7/17/84 9/3/84	814.37 2,084.30 122.56 1,420.15
E. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Quick Print 5501 N. Lamar, Suite C-105 Austin, TX 78751	Printing service Disbursement for ☐ Primary ☒ General ☐ Other (specify)	7/12/84 7/24/84 8/1/84	177.09 419.04 41.90
F. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Quick Print (continued)	Printing service Disbursement for ☐ Primary ☒ General ☐ Other (specify)	8/10/84 9/11/84 9/20/84 9/27/84	325.87 589.93 27.02 519.70
G. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Rent-A-Wreck 1529 IH 35 Round Rock, TX 78664	Auto rental Disbursement for ☐ Primary ☒ General ☐ Other (specify)	8/11/84	309.00
H. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Ramada Inn Tyler Texas 75701	Fundraiser Expense Disbursement for ☐ Primary ☒ General ☐ Other (specify)	8/1/84	464.95
I. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Owen Ravell P. O. Box 368 Round Rock, TX 78664	Fundraiser Expenses Disbursement for ☐ Primary ☒ General ☐ Other (specify)	7/12/84 8/24/84	61.27 638.80
SUBTOTAL of Disbursements This Page (optional)			31,277.34
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER
(Use separate ... category ... Summary ...)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Trinity Banc Savings Assoc. 2355 Stemmons Dallas, TX 75207	Taxes Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/26/84 9/19/84 9/27/84	7,9[illegible].07 [illegible] 273.[illegible]
B. Union Station 400 S. Houston Dallas, TX 75202	Room rental Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/3/84 8/1/84 9/20/84	73.00 74.20 75.40
C. Union Station 400 S. Houston Dallas, TX 75202	Room rental Disbursement for: ☒ Primary ☒ General ☐ Other (specify)	8/20/84	9.00
D. United Airlines P. O. Box 66100 Chicago, Ill 60666	Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	8/28/84	422.00
E. U. S. Postmaster Austin, TX	Postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/3/84 7/19/84 7/26/84 8/24/84	650.00 200.00 390.00 950.00
F. U. S. Postmaster Austin, TX	Postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/4/84 9/11/84 9/26/84	500.00 500.00 650.00
G. U. S. Postmaster Dallas, TX	Postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/10/84 7/30/84 8/10/84	1,000.00 1,000.00 2,000.00
H. U. S. Postmaster Dallas, TX	Postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/11/84 8/1/84 8/24/84	200.00 2,000.00 2,000.00
I. U. S. Postmaster Dallas, TX	Postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84 9/13/84 9/17/84	2,000.00 200.00 650.00
SUBTOTAL of Disbursements This Page (optional)			23,776.55
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Karl Rove & Co. P. O. Box 1902 Austin, TX 78767	Mailings Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	7/12/84 7/13/84	8,238.70 8,647.12
B. Karl Rove & Co. (continued)	Mailings Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/20/84	384.12
C. Sheraton Waco 801 S. 4th St. Waco, TX 76706	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84	224.40
D. Bemis Smith 2451 Stemmons Freeway Dallas, TX 75207	Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 8/1/84 8/23/84 9/11/84	1,240.01 110.00 625.18 579.98
E. Bemis Smith (continued)	Postage & shipping Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 8/1/84 9/11/84	74.00 872.14 492.10
F. Bemis Smith (continued)	Phone reimbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84	135.30
G. Bemis Smith (continued)	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 7/30/84 8/1/84	911.55 911.55 911.55
H. Bemis Smith (continued)	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/20/84 9/26/84	911.55 911.55 911.55
I. Southwestern Bell P. O. Box 220012 Dallas, TX 75394	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/6/84 7/12/84 7/17/84	42.00 1,158.64 627.37
SUBTOTAL of Disbursements This Page (optional)			28,920.56
TOTAL This Period (last page this line number only)			

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LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Holden Business Machines 7108 Military Parkway Dallas, TX 75227	Typewriter rental Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 8/1/84 8/20/84 9/11/84	130.00 130.00 23.40 137.80
B. Holden Business Machines (continued)	Typewriter rental Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/28/84	182.80
C. Holden Business Machines (continued)	Typewriter rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	8/20/84 9/27/84	34.20 233.20
D. Holiday Inn Civic Center P. O. Box 2978 McAllen, TX 78501	Fundraiser Expense Disbursement for ☐ Primary ☒ General ☐ Other (specify)	8/24/84	2,097.71
E. Hulsey-Ingram Oil Co. Dallas Federal Savings Tower 8333 Douglas #1370 Dallas, TX 75225	Airplane charter Disbursement for ☐ Primary ☒ General ☐ Other (specify)	8/1/84	343.00
F. Elizabeth Hurley 1620 Waterston, #202 Austin, TX 78703	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/12/84 7/30/84 8/10/84 8/24/84	937.80 937.80 937.80 937.80
G. Elizabeth Hurley (continued)	Salary Disbursement for ☐ Primary ☒ General ☐ Other (specify)	9/13/84 9/26/84	937.80 937.80
H. Elizabeth Hurley (continued)	Travel Disbursement for ☐ Primary ☒ General ☐ Other (specify)	7/6/84 8/1/84 9/11/84 9/[illegible]/84	151.17 109.78 264.86 217.40
I. Elizabeth Hurley (continued)	Shipping & postage expense Disbursement for ☐ Primary ☒ General ☐ Other (specify)	7/6/84 8/1/84	80.62 7.75

SUBTOTAL of Disbursements This Page (optional) 9,770.49

TOTAL This Period (last page this line number only) . . . . . .

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Wendy Gramm Drawer AO College Station, TX 77840	Travel reimbursement Disbursement for ☐ Primary ☒ General ☐ Other (specify)	9/11/84	924.16
B. Jeb Hensarling 711 Navarro, #620 San Antonio, TX 78205	Consulting fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/14/84 9/26/84	333.06 405.50
C. Jeb Hensarling 711 Navarro, #620 San Antonio, TX 78205	Consulting fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/12/84 7/30/84 8/10/84 8/24/84	1,000.00 1,000.00 1,000.00 1,000.00
D. Jeb Hensarling (continued)	Consulting fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/14/84 9/26/84	1,000.00 1,000.00
E. Jeb Hensarling (continued)	Travel reimbursement Disbursement for ☐ Primary ☒ General ☐ Other (specify)	7/6/84 8/10/84 9/20/84 9/27/84	756.21 197.30 169.22 511.60
F. Jeb Hensarling (continued)	Reimburse fundraiser & meeting expenses Disbursement for ☐ Primary ☒ General ☐ Other (specify)	7/6/84 8/10/84 9/17/84	158.83 165.00 500.00
G. Jeb Hensarling (continued)	Office Supplies & Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84 9/20/84 9/27/84	280.79 5.02 65.39
H. Carey Hobbs P. O. Box 151 Groesbeck, TX 76642	Airplane Charter Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 7/17/84 8/1/84	8,239.00 10,767.50 10,008.00
I. Carey Hobbs (Continued)	Airplane Charter Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/11/84 9/26/84	10,281.50 3,345.00 6,262.50
SUBTOTAL of Disbursements This Page (optional)			59,375.58
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

6 of [illegible] NUMBER [illegible] (Use separate schedule(s) for a category of the Detailed Summary [illegible])

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

Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code Michalyn J. Jones 3600 Greystone #702 Austin, TX 78731	Purpose of Disbursement Reimburse fundraiser Exp. Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 8/24/84	Amount of Each Disbursement This Period 52.13
B. Full Name, Mailing Address and ZIP Code Adventure Printing P. O. Box 29543 Dallas, TX 75229	Purpose of Disbursement printing Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/27/84	Amount of Each Disbursement This Period 6,338.80
C. Full Name, Mailing Address and ZIP Code Michalyn J. Jones 3600 Greystone #702 Austin, TX 78731	Purpose of Disbursement Office supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/27/84	Amount of Each Disbursement This Period 389.51
D. Full Name, Mailing Address and ZIP Code Hilton Palacio Del Rio 200 S. Alamo San Antonio, TX 78205	Purpose of Disbursement Fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/27/84	Amount of Each Disbursement This Period 500.00
E. Full Name, Mailing Address and ZIP Code Aaron Rents and Sells 4312 McEwen Road Dallas, TX 75234	Purpose of Disbursement Office Furniture rental Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/27/84	Amount of Each Disbursement This Period 604.26
F. Full Name, Mailing Address and ZIP Code Aries Office Products 16775 Addison Road, #615 Dallas, TX 75248	Purpose of Disbursement Typewriter rental Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 7/12/84 9/11/84 8/10/84 9/27/84	Amount of Each Disbursement This Period 56.97 56.97 56.97 57.04
G. Full Name, Mailing Address and ZIP Code Debra L. Draper 205 Heartz Road Coppell, TX 75019	Purpose of Disbursement Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/27/84	Amount of Each Disbursement This Period 184.50
H. Full Name, Mailing Address and ZIP Code Lynn Furlow 5631 Spring Valley, #230 Dallas, TX 75240	Purpose of Disbursement Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/27/84	Amount of Each Disbursement This Period 480.00
I. Full Name, Mailing Address and ZIP Code Farr Building Services P. O. Box 9802, #579 Austin, TX 78766	Purpose of Disbursement Office Maintenance Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 8/1/84 9/11/84 9/27/84	Amount of Each Disbursement This Period 55.74 111.48 111.48
SUBTOTAL of Disbursements This Page (optional)			9,055.85
TOTAL This Period (last page this line number only)			

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category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Flint Corporation 2355 Stemmons Dallas, TX 75207	Computer accessories Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/17/84 8/1/84	1,759.36 489.31
B. Flint Corporation (continued)	Furniture Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/11/84	321.60
C. Thomas E. Foster 8 Valleylake Place, Apt H Cockeysville, MD 21030	Media production tape Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/1/84	222.00
D. General Telephone Co. of the S.W. P. O. Box 2933 Austin, TX 78769	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/1/84 7/25/84 8/9/84	181.31 325.63 7.54
E. General Telephone Co. of the S.W. (continued)	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	8/22/84 9/21/84	328.91 547.33
F. Arthur Goldblum Co. 3100 Eastside Houston, TX 77098	Rent Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/3/84 8/1/84 9/4/84	1,300.00 1,300.00 1,300.00
G. Gourmet Catering 9725 Anderson Mill Austin, TX 78750	Fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/10/84 8/10/84	1,500.00 346.15
H. Latrell Govan 6618 Lockheed Dallas, TX 75209	Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/17/84 9/27/84	300.00 600.00
I. Phil Gramm Drawer AO College Station, TX 77840	Travel reimbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/11/84 9/20/84	185.00 580.00 415.00
SUBTOTAL of Disbursements This Page (optional)			12,009.14
TOTAL This Period (last page this line number only)			

SCHEDULE B — ITEMIZED DISBURSEMENTS — (category of the Detailed Summary Page)

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Name of Committee (In Full)
FRIENDS OF PHIL GRAMM

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
A. Full Name, Mailing Address and ZIP Code Carol Frost Cook P. O. Box 33264 Austin, TX 78704	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/30/84 8/10/84 8/24/84 9/17/84	1,244.40 860.70 860.70 860.70
B. Full Name, Mailing Address and ZIP Code Carol Frost Cook (Continued)	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/26/84	860.70
C. Full Name, Mailing Address and ZIP Code Carol Frost Cook (continued)	Purpose of Disbursement Travel reimbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/1/84 9/11/84	58.00 119.75
D. Full Name, Mailing Address and ZIP Code Dorothy R. Curtis 2834 Whisper Fawn San Antonio, TX 78230	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 7/30/84	375.35 65.88
E. Full Name, Mailing Address and ZIP Code Dorothy R. Curtis (continued)	Purpose of Disbursement Reimbursement for fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84	74.58
F. Full Name, Mailing Address and ZIP Code Custom Catering P. O. Box 362 Trinity, TX 75862	Purpose of Disbursement Fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/1/84 9/27/84	1,100.00 506.40
G. Full Name, Mailing Address and ZIP Code Ruth Cymber 4406 Chesapeake St., N.W. Washington, D. C. 20016	Purpose of Disbursement Travel reimbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/6/84 7/6/84 8/24/84 8/24/84	485.39 31.06 22.64 439.60
H. Full Name, Mailing Address and ZIP Code Ruth Cymber (continued)	Purpose of Disbursement Travel reimbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/7/84	598.30
I. Full Name, Mailing Address and ZIP Code Ruth Cymber (continued)	Purpose of Disbursement Reimbursement shipping expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84	28.65
SUBTOTAL of Disbursements This Page (optional)			8,592.80
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Southwestern Bell P. O. Box 220012 Dallas, TX 75394	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/22/84 8/1/84 8/10/84	505.00 473.93 1,253.49
B. Full Name, Mailing Address and ZIP Code Southwestern Bell (continued)	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/11/84 9/20/84	780.51 2,550.00 2,356.26
C. Full Name, Mailing Address and ZIP Code Southwestern Bell (continued)	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/19/84	1,298.50
D. Full Name, Mailing Address and ZIP Code Southwestern Bell P. O. Box 1550 Houston, TX 77001	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/17/84 8/10/84 9/20/84 9/27/84	361.12 363.27 423.35 160.00
E. Full Name, Mailing Address and ZIP Code Southwestern Bell P. O. Box 90 San Antonio, TX 78287	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/12/84 7/17/84 8/10/84	811.39 883.53 2,936.62
F. Full Name, Mailing Address and ZIP Code Southwestern Bell (continued)	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/11/84 9/20/84	876.77 1,575.17 1,252.15
G. Full Name, Mailing Address and ZIP Code Michael A. Sterlacci 5105-P Backlick Road Annandale, VA 22003	Legal services Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	7/6/84	625.00
H. Full Name, Mailing Address and ZIP Code Deane Stoltz P.O. Box 3179 Midland, TX 79702	Fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84	1,085.27
I. Full Name, Mailing Address and ZIP Code V. Lance Tarrance & Associates 3845 West FM 1960, #400 Houston, TX 77068	Survey Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 8/1/84 8/10/84	13,500.00 14,050.00 4,000.00
SUBTOTAL of Disbursements This Page (optional)			52,121.33
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER
(Use separate schedule(s) for each category of the detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. American Airlines P. O. Box 51340, Maildrop 386 Tulsa, OK 74151	Air travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/25/84 8/28/84 9/18/84	323.00 357.00 320.00
B. American Business Telephone System 3300 Keller Springs Carrollton, TX 75006	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 8/1/84 8/10/84	120.26 289.26 67.58
C. American Business Telephone System (continued)	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/20/84 8/24/84 9/11/84	14.19 45.00 232.37
D. American Business Telephone System (continued)	Telephone service Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	8/20/84	37.68
E. Arlin Development Co. 2355 Stemmons, Suite 503 Dallas, TX 75207	Accounting service Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/3/84 7/17/84 8/1/84 9/26/84	2,000.00 2,000.00 2,000.00 2,000.00
F. Lorie J. Arnett 1803 Eastwood Houston, TX 77023	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/30/84 8/10/84 8/24/84	464.07 464.07 464.07
G. Lorie J. Arnett (continued)	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/13/84 9/26/84	464.07 464.07
H. Lorie J. Arnett (continued)	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84	464.07
I. Asmon Custom Photo Service 926 Pennsylvania Ave., S.E. Washington, D. C.	Photographic service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/10/84 9/27/84	487.60 243.80
SUBTOTAL of Disbursements This Page (optional)			13,322.16
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Laurie Rich 6019 Ridgecrest, #207 Dallas, TX 75231	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 7/30/84 8/10/84	576.25 576.25 576.25
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Laurie Rich (continued)	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/14/84 9/26/84	576.25 576.25 576.25
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Laurie Rich (continued)	Office Supplies & Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/20/84 8/10/84 8/28/84	102.12 192.37 200.42
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Laurie Rich (continued)	Office Supplies & Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/14/84 9/27/84	81.23 184.85 79.20
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Laurie Rich (continued)	Postage & shipping Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/19/84 7/20/84 7/30/84 9/14/84	104.41 49.94 215.00 166.39
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Laurie Rich (continued)	Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84	56.40
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dr. Luis Rios Route 1, Box 585 McAllen, TX 78504	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/20/84	556.91
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Vic Rogers P. O. Box 1310 Beaumont, TX 77704	Fundraising Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/28/84	965.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Karl Rove & Co. P. O. Box 1902 Austin, TX 78767	Travel Exp. Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 9/27/84	98.00 179.44
SUBTOTAL of Disbursements This Page (optional)			6,689.38
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. AT&T Info Systems P. O. Box 27-850 Kansas City, MO 64180	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 7/24/84 8/24/84	194.47 328.32 198.21
B. AT&T Info Systems (continued)	Telephone service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/27/84 9/3/84 9/20/84 9/28/84	177.24 178.92 189.52 2,325.50
C. Austin Business Machines 8745 N. Lamar Austin, TX	Typewriter rental & office supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/1/84 9/20/84	110.00 92.77
D. Automated Business Mail, Inc. 5515 Livingston Road, S.E. Washington, D. C. 20021	Mailings Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/17/84 7/24/84 8/1/84 9/11/84	1,326.89 90.83 162.54 1,209.00
E. Bethesda Engravers 5801 Erdman Avenue Baltimore, MD 21205	Printing Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84	433.50
F. Black, Manafort & Stone 324 N. Fairfax Alexandria, VA 22314	Advance media buy Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/6/84 7/9/84 7/10/84 7/12/84	15,000.00 20,000.00 35,000.00 35,000.00
G. Black, Manafort & Stone (continued)	Advance media buy Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/16/84 7/23/84 7/30/84	35,000.00 150,000.00 75,000.00
H. Black, Manafort & Stone (continued)	Advance media buy Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/13/84 8/21/84 9/4/84 9/4/84	50,000.00 100,000.00 12,500.00 245,000.00
I. Black, Manafort & Stone (continued)	Advance media buy Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/12/84 9/20/84 9/28/84	200,000.00 210,000.00 710,000.00
SUBTOTAL of Disbursements This Page (optional)			1,899,517.71
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
A. Harris County Victory '84 3215 W. Alabama Houston, TX 77098	Computer lists	9/27/84	2,717.76
B. R. L. Horton 61 Reisner St., Room 162 Houston, TX 77002	Contract labor	9/28/84	195.00
C. Loews Anatole Hotel 2201 Stemmons Dallas, TX 75207	Reception Expense	9/28/84	466.19
D. Broadway Party Pictures c/o Kathy Obriotti 2500 Tower Life Bldg. San Antonio, TX 78205	Fundraiser Expense	8/17/84	480.03
E. Kelly Services, Inc. P. O. Box 32668 Detroit, Michigan 48232	Contract labor	8/24/84 9/11/84 9/20/84 9/28/84	797.25 573.75 51.00 405.57
F. Karen R. Kitterman 5750 Marquita, #5 Dallas, TX 75206	Salary	7/12/84 7/30/84 8/15/84 8/24/84	558.45 558.45 558.45 707.05
G. Karen Kitterman (continued)	Salary	9/13/84 9/26/84	632.75 632.75
H. Karen R. Kitterman (continued)	Travel	9/30/84 9/27/84	30.40 100.80
I. Karen Kitterman (continued)	Shipping & postage	9/20/84	157.60
SUBTOTAL of Disbursements This Page (optional)			9,6[illegible].25
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Campack Systems Corp. 2000 M Street, N. W., #560 Washington, D. C. 20036	Computer services & mailings Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/3/84 8/3/84 9/11/84	9,400.00 56,489.48 30,488.31
B. Captiol View Catering 2725 Pennsylvania Ave., S.E. Washington, D. C. 20020	Fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/24/84	8,100.00
C. Carpet Services, Inc. 2451 Stemmons Freeway Dallas, TX 75207	Rent Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 8/1/84 9/4/84	1,250.00 1,250.00 1,250.00
D. The Casey Partners 2932 Robinhood Houston, TX 77005	Printing service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/17/84	2,321.59
E. Clampitt Paper Co. 3792 Drossett Austin, TX	Shipping Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/26/84	287.10
F. Communication Specialists, Inc. One River, P. O. Box 1529 Austin, TX 78767	Printing & mailings Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/17/84 9/11/84	848.50 5,194.27
G. Communication Specialists, Inc. (continued)	Primary file update Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	8/20/48	5,539.17
H. John Weaver 7122 Wood Hollow, #84 Austin, TX 78731	Travel Reimbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/1/84	1,485.55
I. Continental Airlines 2929 Allan Parkway, Box 4607 Houston, TX 77210-4607	Air travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/28/84	440.00
SUBTOTAL of Disbursements This Page (optional)			124,343.97
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Elizabeth S. Hurley 1620 Waterston, #202 Austin, TX 78703	Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/10/84	26.00
B. Henry T. Brooks P. O. Box 1428 Conroe, TX 77305	Advertising Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/10/84	672.00
C. IBM Corporation P. O. Box 660176 Dallas, TX 75234	Computer & supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 7/24/84 7/30/84 8/1/84	2,531.73 38.87 21,725.00 398.00
D. IBM Corporation (continued)	Computer & Supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 8/24/84 9/11/84 9/20/84	128.50 800.00 5,059.88 595.45
E. Michalyn J. Jones 3600 Greystone #702 Austin, TX 78731	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 7/30/84 8/10/84 8/24/84	576.25 576.25 576.25 576.25
F. Michalyn J. Jones (continued)	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/13/84 9/28/84	576.25 576.25
G. Michalyn J. Jones (continued)	Office supplies & expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/10/84 8/24/84 9/7/84 9/12/84	62.21 131.13 176.25 205.10
H. Michalyn J. Jones (continued)	Office supplies & expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/19/84 9/24/84 7/26/84 8/1/84	484.70 400.00 232.62 134.39
I. Michalyn J. Jones (continued)	Shipping & postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 8/10/84	300.00 95.15

SUBTOTAL of Disbursements This Page (optional) 37,654.48

TOTAL This Period (last page this line number only) .....

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SCHEDULE B — ITEMIZED Disbursements — (Category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code Phoenix Screen Printing 2356 Irving Blvd. Dallas, TX 75207	Purpose of Disbursement Campaign buttons Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 8/20/84	Amount of Each Disbursement This Period 16.74
B. Full Name, Mailing Address and ZIP Code Pitney-Bowes P. O. Box 38390 Louisville, Ky 40233	Purpose of Disbursement Postage meter rental Disbursement for: ☐Primary ☒General ☐Other (specify):	Date (month, day, year) 7/3/84 7/17/84 9/11/84	Amount of Each Disbursement This Period 59.25 419.97 419.97
C. Full Name, Mailing Address and ZIP Code Pitney-Bowes (continued)	Purpose of Disbursement Postage meter supplies Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 7/3/84	Amount of Each Disbursement This Period 19.80
D. Full Name, Mailing Address and ZIP Code P/M Consulting 202 E. Street, N.E. Washington, D. C. 20002	Purpose of Disbursement Fundraising Expenses Salaries, Mailings Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 7/2/84 7/9/84 7/16/84	Amount of Each Disbursement This Period 20,000.00 25,000.00 16,000.00
E. Full Name, Mailing Address and ZIP Code P/M Consulting (Continued)	Purpose of Disbursement (continued) Disbursement for: ☒Primary ☐General ☐Other (specify)	Date (month, day, year) 7/20/84 7/22/84 8/22/84	Amount of Each Disbursement This Period 25,000.00 40,000.00 25,000.00
F. Full Name, Mailing Address and ZIP Code P/M Consulting (Continued)	Purpose of Disbursement (continued) Disbursement for: ☒Primary ☐General ☐Other (specify):	Date (month, day, year) 9/4/84 9/28/84	Amount of Each Disbursement This Period 30,000.00 33,000.00
G. Full Name, Mailing Address and ZIP Code P/M Consulting (Continued)	Purpose of Disbursement (continued) Disbursement for ☐Primary ☒General ☐Other (specify):	Date (month, day, year) 9/11/84 9/19/84 9/16/84 9/13/84	Amount of Each Disbursement This Period 7,193.12 27,240.56 5,000.00 33,187.92
H. Full Name, Mailing Address and ZIP Code Tissa Porter Advertising 401 Mitchell Bryan, TX 77801	Purpose of Disbursement Fundraiser Expenses Disbursement for: ☐Primary ☒General ☐Other (specify):	Date (month, day, year) 9/20/84	Amount of Each Disbursement This Period 3,625.40
I. Full Name, Mailing Address and ZIP Code Postal Instant Press 814 S. Beckham Ave. Tyler, TX 75701	Purpose of Disbursement Printing Disbursement for: ☐Primary ☒General ☐Other (specify):	Date (month, day, year) 8/1/84	Amount of Each Disbursement This Period 323.37
			290,825.60
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Maple Supply Corp. 5353 Maple, Suite 100 Dallas, TX 75235	Office supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84	369.4[illegible]
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Deborah Mellody 4030 Travis #222 Dallas, TX 75204	Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/26/84 8/10/84 8/24/84	175.50 441.00 141.75
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Deborah Mellody (continued)	Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/14/84 9/28/84	285.75 524.25
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Boone Pickens P. O. Box 1432 Amarillo, TX 79101	Fundraiser Exp Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84	364.33
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Fred Meyer 3200 San Jacinto Tower Dallas, TX 75201	Fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84	1,184.70
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Miller, Canfield, Paddock & Stone 1015 15th St. N.W., #1200 Washington, D. C. 20005	Legal services Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	7/6/84	3,381.23
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Miller, Canfield, Paddock & Stone (continued)	Legal services Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84	2,629.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Larry Miller 7407 Fair Oaks, #105 Dallas, TX 75231	Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/27/84	263.50
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Monarch Trophy Studio c/o Madeline Margraves 12234 Boheme Drive Houston, TX 77024	Fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/27/84	410.75
SUBTOTAL of Disbursements This Page (optional)			10,171.19
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Aaron Rents and Sells 4312 McEwen Road Dallas, TX 75234	Rental of office furniture Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 7/30/84 8/20/84 9/4/84	57.00 57.00 10.26 60.42
B. Aaron Rents and Sells (continued)	Rental of office furniture Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	8/20/84	13.09
C. ABM Coffee Service 11410 Harry Hines #1 Dallas, TX 75229	Coffee service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 8/1/84 8/24/84 9/20/84	55.00 89.14 55.00 55.00
D. Adventure Printing 2441 Halifax Street Dallas, TX 75229	Printing service Disbursement for ☐ Primary ☒ General ☐ Other (specify):	7/12/84 8/10/84 8/20/84	1,652.00 1,000.00 159.12
E. Action Business Services 4601 Greenville Ave. Dallas, TX 75207	Printing services Disbursement for ☐ Primary ☒ General ☐ Other (specify)	7/24/84	419.98
F. Aggieland Hotel 1502 S. Texas Ave. College Station, TX 77840	Ballroom rental Disbursement for ☒ Primary ☐ General ☐ Other (specify):	8/20/84	1,348.31
G. Ailes Communications 436 W. 43rd Street New York, N. Y. 10036	Media Production Disbursement for ☐ Primary ☒ General ☐ Other (specify):	7/6/84 7/30/84 7/9/84 7/15/84	5,839.35 2,500.00 15,500.00 15,500.00
H. Ailes Communications (continued)	Media Production Disbursement for ☐ Primary ☒ General ☐ Other (specify)	8/1/84 9/4/84 9/4/84 9/28/84	15,500.00 19,394.00 15,500.00 49,950.00
I. Air One, Inc. 4433 Woodson Road St. Louis, MO 63134	Air travel Disbursement for ☐ Primary ☒ General ☐ Other (specify)	8/28/84	1,204.00
SUBTOTAL of Disbursements This Page (optional)			145,918.67
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 17
(Use separate sch[illegible] category of [illegible] Summa[illegible]

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Monroe Systems for Business Box 9000R Morristown, NJ 07960	Copier rental & supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	8/1/84 8/10/84 8/20/84 9/20/84	193.[illegible] 522.[illegible] 613.41 147.9[illegible]
B. Monroe Systems for Business (continued)	Copier rental & Supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/17/84 9/27/84 9/28/84 7/3/84	691.85 180.20 65.72 563.7[illegible]
C. Monroe Systems for Business (continued)	Copier rental & supplies Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	8/20/84	34.85
D. Monroe Systems for Business (continued)	Copier rental & Supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/11/84 9/19/84	502.89 111.74
E. Vicki Morawa 2602 Jenny Lane Euless, TX 76039	Contract Labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/17/84 9/27/84	320.00 640.00
F. Paul Mousseau, Jr. 620 S. 1st St., #109 Austin, TX 78704	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	8/10/84 8/24/84 9/14/84 9/26/84	805.50 805.50 805.50 805.50
G. Lawrence A. Neal 118 S. Pershing Arlington, VA 22204	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	8/24/84 9/13/84 9/26/84	1,444.28 1,343.21 1,260.51
H. Lawrence A. Neal (continued)	Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/20/84	522.97
I. Lawrence A. Neal (continued)	Travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	9/27/84	366.21
SUBTOTAL of Disbursements This Page (optional)			12,748.18
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER [illegible]
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Espinoza Printing Co. (continued)	Printing service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/27/84 9/28/84 9/27/84	1,938.74 1,241.28 1,993.02
B. Del Mar P. O. Box 26471 Austin, TX 78755071	2 months staff lodging Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/20/84 9/27/84	600.00 600.00
C. Fairchild/LeMaster, Inc. 4300 MacArthur Ave., Suite 201 Dallas, TX 75209	Media services Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/28/84	5,000.00
D. Highlander Inn Burnet TX 78611	Fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84	228.46
E. Federal Express Corp. P. O. Box 727, Dept A Memphis, TN 38194	Shipping expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/3/84 7/12/84 7/17/84	122.50 101.50 208.50
F. Federal Express Corp. (continued)	Shipping expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/24/84 8/1/84 8/10/84 8/24/84	91.50 205.00 79.00 132.00
G. Federal Express Corp. (continued)	Shipping Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84 9/20/84 9/27/84	269.00 119.00 161.50
H. First City National Bank of Bryan Drawer 913 Bryan, TX 77805	Service account Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/17/84 8/24/84	401.33 342.72
I. First Word Temporaries 14755 Preston Road, #435-LB24 Dallas, TX 75240	Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/11/84	736.12 467.12
SUBTOTAL of Disbursements This Page (optional)			15,038.29
TOTAL This Period (last page this line number only)			

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SCHEDULE [illegible] ITEMIZED DISBURSEMENTS (Use separate schedule for each category of the Summary [illegible])

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Yvonne L. Kohutek 13133 Country Trail San Antonio, TX 78216	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/13/84	215.85
B. Yvonne L. Kohutek (continued)	Meeting refreshments Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/6/84	49.05
C. Thomas J. Lankford P. O. Box 1504 Washington, D. C. 20013-1504	Printing service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 7/12/84 8/10/84 9/20/84	29.05 170.00 139.80 31.60
D.	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
E. Lindsay Office Products, Inc. P. O. Box 1786 Austin, TX 78767	Office Supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 7/17/84 8/1/84 8/10/84	94.46 68.68 163.11 99.53
F. Lindsay Office Products, Inc. (continued)	Office Supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/20/84 9/27/84	43.58 44.67 126.21
G. Lindsay Office Products, Inc. P. O. Box 1786 Austin, TX 78767	Office Supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/11/84	285.84
H. Luce Press Clipping Service Box 379 Topeka, KS 66601	Media Services Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/17/84 9/27/84	5,964.15 267.18
I. Richard McBride P. O. Box 4 Round Rock, TX	Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 8/1/84 8/10/84 9/20/84	1,733.22 1,525.47 764.96 765.26
SUBTOTAL of Disbursements This Page (optional)			12,892.67
TOTAL This Period (last page this line number only)			

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Name of Committee (in Full)
FRIENDS OF PHIL GRAM

A. Full Name, Mailing Address and ZIP Code Carol Reed Associates 2500 McKinney, Suite A Dallas, TX 75201	Purpose of Disbursement Consulting fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 7/12/84 7/30/84 8/10/84 8/24/84	Amount of Each Disbursement This Per 1,500.00 1,500.00 1,500.00 1,500.00
B. Full Name, Mailing Address and ZIP Code Carol Reed Associates (continued)	Purpose of Disbursement Consulting fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/14/84 9/26/84	Amount of Each Disbursement This Per 2,000.00 2,000.00
C. Full Name, Mailing Address and ZIP Code Carol Reed Associates (continued)	Purpose of Disbursement Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/11/84 9/27/84	Amount of Each Disbursement This Per 168.81 242.46
D. Full Name, Mailing Address and ZIP Code Carol Reed Associates (continued)	Purpose of Disbursement Office Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 7/6/84	Amount of Each Disbursement This Per 42.33
E. Full Name, Mailing Address and ZIP Code Carol Reed Associates (continued)	Purpose of Disbursement Office Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 8/10/84 9/27/84	Amount of Each Disbursement This Per 40.28 39.35
F. Full Name, Mailing Address and ZIP Code Republic Security 800 W. Garland Garland, TX 75040	Purpose of Disbursement Fundraiser Ball Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/19/84	Amount of Each Disbursement This Per 229.93
G. Full Name, Mailing Address and ZIP Code Reuben's Bottle Shop c/o Owen Ravell Box 368 Round Rock, TX 78664	Purpose of Disbursement Fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 8/10/84	Amount of Each Disbursement This Per 420.39
H. Full Name, Mailing Address and ZIP Code RHM, Inc. P. O. Box 4 Round Rock, TX 78664	Purpose of Disbursement Consulting Fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 7/12/84 7/30/84 8/10/84 8/24/84	Amount of Each Disbursement This Per 3,000.00 3,000.00 3,000.00 3,000.00
I. Full Name, Mailing Address and ZIP Code RHM, Inc. (continued)	Purpose of Disbursement Consulting Fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/14/84 9/27/84	Amount of Each Disbursement This Per 3,000.00 3,000.00
SUBTOTAL of Disbursements This Page (optional)			29,183.55
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Page
A. Richard McBride P. O. Box 4 Round Rock, TX 78664	Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/27/84	296.61
B. Richard McBride (continued)	Office Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/6/84 8/10/84	50.00 1,034.25
C. Richard McBride (continued)	Postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/3/84 8/10/84	800.00 300.00
D. Richard McBride (continued)	Phone Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/23/84 7/24/84	38.32 269.25
E. Maple Supply Corp. 5353 Maple, Suite 100 Dallas, TX 75235	Office Supplies Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 8/1/84 8/20/84 9/28/84	85.43 208.51 17.02 89.39
F. Maple Supply Corp. (continued)	Office Supplies Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	8/20/84	52.61
G. Mark 1 Communications P. O. Box 18782 Fort Worth, TX 76118	Fundraising Expense and direct mailing Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 7/17/84 8/1/84	6,750.00 1,260.48 4,822.50
H. Market Opinion Research 550 Washington Blvd. Detroit, Michigan 48226	Phone Banks Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/28/84	34,500.00
I. Marshall Civic Center P. O. Box 698 Marshall, TX 75670	Fundraiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/27/84	273.00
SUBTOTAL of Disbursements This Page (optional)			50,847.37
TOTAL This Period (last page this line number only)			

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SCHEDULE B

(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Pat Black 6127 Sanford Houston, TX 77096	Fund Raiser expense Disbursement for ☐ Primary ☒ General ☐ Other (specify):	8/1/84 7/6/84 9/20/84 7/17/84	32.64 286.93 88.16 8.18
B. Pat Black (Continued)	Consulting Fees Disbursement for ☐ Primary ☒ General ☐ Other (specify):	7/12/84 7/30/84 8/1/84	1,500.00 1,500.00 1,500.00
C. Pat Black (Continued)	Consulting Fees Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/14/84 9/26/84	1,500.00 1,500.00 1,500.00
D. Laurie Linn Brown 3428 Rosedale, Apt C Dallas, TX 75205	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/10/84 8/24/84 9/13/84 9/26/84	363.61 479.80 479.80 479.80
E. Paul Brown One Grand Centre, #300 Sherman, TX 75090	Reimbursement for fund-raiser Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 7/24/84	22.40 976.66
F. Brazos Center 3232 Briarcrest Drive Bryan, TX 78701	Facilities rental Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/4/84	585.40
G. Hilda Bustos Route 1, Box 211-WA San Antonio, TX 78223	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/26/84	499.32
H. Campac Publications 210 7th St., S.E., Suite C25 Washington, D. C. 20003	Mailings Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/24/84	2,058.36
I. Campack Systems Corp. 2000 M Street, N. W., #560 Washington, D. C. 20036	Computer services & mailings Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/6/84 7/12/84 7/17/84	4,000.00 4,000.00 34,867.67
SUBTOTAL of Disbursements This Page (optional)			58,228.73
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENT

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Name of Committee (in Full)

FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Black, Manafort & Stone 324 N. Fairfax Alexandria, VA 22314	Consulting fee Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/17/84 8/10/84 9/20/84	10,000.00 5,000.00 5,000.00
B. Black, Manafort & Stone (Continued)	Travel reimbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/10/84 7/17/84	565.91 3,591.78
C. Black, Manafort & Stone (continued)	Phone reimbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/17/84 8/10/84 9/20/84	556.89 270.85 286.02
D. Black, Manafort & Stone (continued)	Shipping reimbursement Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/17/84 8/10/84 9/20/84	75.25 331.00 52.05
E. Pat Black 6127 Sanford Houston, TX 77096	Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/6/84 7/17/84 8/1/84	59.60 6.00 64.00
F. Pat Black (Continued)	Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/20/84	69.00 123.74
G. Pat Black (Continued)	Office supplies & Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify).	7/17/84 8/1/84 8/24/84 9/20/84	169.30 45.67 172.25 64.96
H. Pat Black (Continued)	Postage & Shipping Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/6/84 7/17/84 8/1/84	29.65 73.75 72.00
I. Pat Black (Continued)	Postage & Shipping Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/24/84 9/20/84	101.80 156.80

SUBTOTAL of Disbursements This Page (optional)	26,938.27
TOTAL This Period (last page this line number only)	

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Summary Page) Page 26 of 32 Line 17

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Floyd DaKil 7506 West Northwest Highway Dallas, TX 75225	Fundraiser expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/28/84	3,353.18
B. Dallas County Republican Party c/o Fred Meyer, Tyler Corp. 3200 San Jacinto Tower Dallas, TX 75201	Literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/17/84	7,000.00
C. Data Logic P. O. Box 831420 Richardson, TX 75083	Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/19/84 9/27/84	4,526.10 892.80
D. Delta Airlines 1800 N. Kent St., #1200 Arlington, VA 22203	Airline travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/24/84	250.00
E. Dependable Printing, Inc. 707 Montgomery St. Alexandria, VA 22314	Printing service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/17/84	950.89
F. Debra L. Draper 205 Heartz Road Coppell, TX 75019	Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/26/84 8/10/84 8/24/84 9/14/84	99.00 258.75 85.50 267.75
G. Duncan Typewriter 3013 N. Lamar Austin, TX 78705	Typewriter rental Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9/27/84 7/17/84 8/24/84	204.75 65.00 204.75
H. 1800 Plaza Partnership 1804 N. E. Loop, 410 San Antonio, TX 78217	Rent Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/3/84 7/23/84 9/4/84 9/11/84	760.20 998.00 879.20 50.88
I. Espinoza Printing Co. 1815 Young Street Dallas, TX 75201	Printing service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/1/84 8/10/84 9/11/84	322.24 1,169.64 1,150.10
SUBTOTAL of Disbursements This Page (optional)			23,488.73
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page ___ of ___
LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Loy Norris 245 S. W. Dian Burleson, TX 76028	Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/12/84 7/30/84 8/15/84	250.00 250.00 250.00
B. Full Name, Mailing Address and ZIP Code Loy Norris (continued)	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	8/24/84 9/14/84 9/26/84	250.00 250.00 250.00
C. Full Name, Mailing Address and ZIP Code Loy Norris (continued)	Purpose of Disbursement Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/6/84 8/1/84 8/24/84	25.22 95.27 47.63
D. Full Name, Mailing Address and ZIP Code Loy Norris (continued)	Purpose of Disbursement Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/20/84 9/27/84	277.55 30.37
E. Full Name, Mailing Address and ZIP Code Loy Norris (continued)	Purpose of Disbursement Xerox copies Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/6/84 9/27/84	10.50 5.00
F. Full Name, Mailing Address and ZIP Code Mrs. Sylvia Nugent 800 Avondale Amarillo, TX 79106	Purpose of Disbursement Fundraiser expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/24/84	1,940.47
G. Full Name, Mailing Address and ZIP Code Pamela Peadon 553 Blanning Dr. Dallas, TX 75218	Purpose of Disbursement Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/11/84 9/17/84 9/27/84	267.00 258.00 120.00
H. Full Name, Mailing Address and ZIP Code Arnoldo Pedraza 2101 Rio Grande, Apt H Austin, TX 78705	Purpose of Disbursement Contract labor Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/2/84	224.00
I. Full Name, Mailing Address and ZIP Code Phoenix Screen Printing 2356 Irving Blvd. Dallas, TX 75207	Purpose of Disbursement Campaign buttons Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	7/5/84 8/20/84	900.00 54.00
SUBTOTAL of Disbursements This Page (optional)			5,755.01
TOTAL This Period (last page this line number only)			

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SCHEDULE B

(Use separate schedule(s) for category of the Detailed Summary Page)

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Name of Committee (in Full)

FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
A. U. S. Postmaster Dallas, TX	Postage	9/20/84 9/19/84 9/27/84	500.00 1,916.00 500.00
B. U. S. Postmaster Dallas, TX	Postage	9/5/84	3,000.00
C. Vanier Graphics Corp. P. O. Box 370 Santee, Calif. 92071	Graphics	7/9/84	552.18
D. Vanier Graphics Corp. P. O. Box 370 Santee, Calif. 92071	Graphics	8/20/84	16.14
E. Waco Convention Center P. O. Box 1370 Waco, TX 76703	Rental of facilities	9/20/84	375.00
F. Waller Insurance Agency 2355 Stemmons Freeway Dallas, TX 75207	Insurance	7/12/84	350.00
G. Wall's Catering 10749 Preston Rd. Dallas, TX 75230	Food Expense	8/10/84 9/20/84	213.90 233.89
H. Warwick Post Oak Hotel 2001 Post Oak Blvd. Houston, TX 77227	Fundraiser Expense	8/1/84	1,708.78
I. Waxahachie Country Club P. O. Box 675 Waxahachie, TX 75165	Fundraiser Expense	9/27/84	1,128.50
SUBTOTAL of Disbursements This Page (optional)			10,494.39
TOTAL This Period (last page this line number only)			

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ITEMIZED DISBURSEMENTS

(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
A. John Weaver 7122 Wood Hollow, #84 Austin, TX 78731	Salary	7/12/84 7/30/84 8/10/84	923.65 987.37 987.37
B. John Weaver 7122 Wood Hollow, #84 Austin, TX 78731	Salary	8/24/84 9/14/84 9/26/84	987.37 987.37 987.37
C. John Weaver (continued)	Travel	7/6/84 8/1/84 8/10/84 8/24/84	1,058.83 665.61 178.41 194.99
D. John Weaver (continued)	Travel	9/11/84	641.55
E. John Weaver (continued)	Shipping Expense	8/10/84	56.40
F. Western Union Telegraph Co. P. O. Box 84832 Dallas, TX 75284	Telegraphic Service	7/12/84 9/19/84	602.00 685.39
G. Kelly Williams 11530 Vance Jackson, #1611 San Antonio, TX 78230	Salary	8/24/84 9/14/84 9/26/84	760.63 489.62 489.62
H. AMS Secretarial Service 6200 N. Central Expressway, #226 Dallas, TX 75206	Secretarial service	9/19/84	830.63
I. Hyatt Regency 300 Reunion Blvd. Dallas, TX 75207	Fundraiser expenses	9/19/84	25,071.14
SUBTOTAL of Disbursements This Page (optional)			37,585.32
TOTAL This Period (last page this line number only)			

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SCHEDULE B: ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
V. Lance Tarrance 3845 West FM 1960, Suite 400 Houston, TX 787068	Travel Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	7/12/84 8/24/84 9/20/84	141.60 630.00 132.00
B. Full Name, Mailing Address and ZIP Code V. Lance Tarrance (continued)	Purpose of Disbursement Survey Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/21/84	Amount of Each Disbursement This Period 6,795.00
C. Full Name, Mailing Address and ZIP Code Texas Employment Commission Austin, Texas 78778	Purpose of Disbursement State Unemployment Tax Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 7/9/84	Amount of Each Disbursement This Period 749.03
D. Full Name, Mailing Address and ZIP Code Texas Employment Commission (Cont'd)	Purpose of Disbursement State Unemployment Tax Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 7/9/84 9/26/84	Amount of Each Disbursement This Period 125.35 923.52
E. Full Name, Mailing Address and ZIP Code Texas Press Service 1718 West Fifth Austin, TX 78701	Purpose of Disbursement News Clipping Service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 7/12/84 8/10/84 7/25/84	Amount of Each Disbursement This Period 1,118.35 1,149.20 481.10
F. Full Name, Mailing Address and ZIP Code Texas Press Service (continued)	Purpose of Disbursement News Clipping Service Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 8/10/84 9/18/84 9/20/84	Amount of Each Disbursement This Period 268.50 489.90 627.95
G. Full Name, Mailing Address and ZIP Code Tissa Porter Advertising P. O. Box 3931 Bryan, TX 77805	Purpose of Disbursement Fundraiser Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/28/84	Amount of Each Disbursement This Period 214.62
H. Full Name, Mailing Address and ZIP Code Trinity Banc Savings Assoc. 2355 Stemmons Dallas, TX 75207	Purpose of Disbursement Taxes Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 7/9/84	Amount of Each Disbursement This Period 221.93
I. Full Name, Mailing Address and ZIP Code Trinity Banc Savings Assoc. (continued)	Purpose of Disbursement Taxes Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 7/9/84 7/30/84 8/24/84	Amount of Each Disbursement This Period 37.15 5,149.20 7,140.35
SUBTOTAL of Disbursements This Page (optional)			26,394.72
TOTAL This Period (last page this line number only)			

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SCHEDULE B • ITEMIZED DISBURSEMENTS

Category of the Disbursement
Summary Page

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Name of Committee (in Full)

FRIENDS OF PHIL GRAMM

A. Full Name, Mailing Address and ZIP Code Party Services, Inc. 6211 W. Northwest Highway Dallas, TX 75225	Purpose of Disbursement Fundraiser Expenses Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/28/84	Amount of Each Disbursement This Period $7,025.70
B. Full Name, Mailing Address and ZIP Code Anglim Associates 1915 Provine Fort Worth, TX 76103	Purpose of Disbursement Photographic services Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/19/84	Amount of Each Disbursement This Period 603.57
C. Full Name, Mailing Address and ZIP Code AVW Audio Visual, Inc. 2241 Irving Blvd. Dallas, TX 75207	Purpose of Disbursement Fundraiser expenses Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/28/84	Amount of Each Disbursement This Period 4,071.39
D. Full Name, Mailing Address and ZIP Code Joe Barta Associates 8434 Stemmons Freeway Dallas, TX 75247	Purpose of Disbursement Fundraiser Expenses Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year) 9/19/84	Amount of Each Disbursement This Period 3,193.50
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			14,894.16
TOTAL This Period (last page this line number only)			

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

SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
FRIENDS OF PHIL GRAMM

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
A. Tab Thompson P. O. Box 1755 Stephenville, TX 76401	Advertisement	7/29/84	$63.00 IN-KIND
B. Harry P. Whitworth 1000 Brazos, Suite 200 Austin, TX 78701	Fundraiser Expense	7/23/84	315.16 IN-KIND
C. Committee for the Survival of a Free Congress 721 Second Street, N.E. Washington, D. C. 20002	Mailings	7/1/84	950.00 IN-KIND
D. Hayden Head 1020 First City Bank Tower Corpus Christi, TX 78477	Fundraiser Expense	9/12/84	839.88 IN-KIND
E. Business Industry - PAC 1747 Pennsylvania Ave., N.W. Washington, D. C. 20006	Mailings	9/26/84	67.48 IN-KIND
F. Mrs. Kay Brand P. O. 1840 McAllen, TX 78501	Reception	9/25/84	432.12 IN-KIND
G. Mr. Gerard J. Lodner Box 1832 Fulton, TX 78358	Reception	9/17/84	314.44 IN-KIND
H. Richard T. Sink P. O. Box BWH Wichita Falls, TX 76307	Reception	9/26/84 9/25/84	491.40 276.99 IN-KIND
I.			

SUBTOTAL of Disbursements This Page (optional)	3,750.47
TOTAL This Period (last page this line number only)	$ 3,101,205.93

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

MINUTES OF COMMITTEE

MEETING OF

AF-PAC

I, Salvador Diaz-Verson, the undersigned Secretary, duly authorized by the By-Laws of American Family Political Action Committee "AF-PAC", as adopted on January 20, 1976, do hereby certify that a meeting of said Committee was held on September 7, 1984, at which meeting by unanimous vote of the members thereof, there was duly adopted the following resolution:

Resolved, that contributions be made to the following committees for said purpose:

John Raese		$5,000.00	Campaign Expense-Primary
Jack Lousma		$5,000.00	Campaign Expense-Primary
Charles Percy		5,000.00	Campaign Expense-General
~~Thad Cochran~~	Returned	~~5,000.00~~	~~Campaign Expense-General~~
Phil Gramm		5,000.00	Campaign Expense-General
Ted Stevens		5,000.00	Campaign Expense-General

IN WITNESS WHEREOF, I have hereunto set my hand as Secretary this 7 day of September, 19 84.

Salvador Diaz-Verson

EXHIBIT #5

E

8904074493

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full)
AMERICAN FAMILY CORPORATION POLITICAL ACTION COMMITTEE C00[redacted]157

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
1984 Southern Victory Tour Democratic Senatorial Campaign Cmte Suite 318, 400 N. Capitol Street Washington, D.C. 20001	Federal Campaign Expense Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-06-84	5,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Elliott Levitas for Congress P.O. Box 984 Decatur, GA 30031	Federal Campaign Expense Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	9-06-84	2,500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A Georgia Tribute to America c/o Coverdell & Company 2015 Peachtree Road, NE Atlanta, GA 30309	Federal Campaign Expense Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-06-84	1,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
John Raese for Senate 150 High Street Morgantown, WV 26505	Federal Campaign Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9-07-84	5,000.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jack Lousma for Senate 516 East Capitol Street, NE Washington, D.C. 20003	Federal Campaign Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9-07-84	5,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Charles H. Percy for Senate 100 N. LaSalle Street, Suite 500 Chicago, IL 60602	Federal Campaign Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9-07-84	5,000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jesse A. Helms for Senate P.O. Box 177000 Raleigh, NC 27619	Federal Campaign Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9-07-84	5,000.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Thad Cochran for Senate P.O. Box 22761 Jackson, MS 39225-2761	Federal Campaign Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9-07-84	5,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Phil Gramm for Senate 5555 N. Lamar, Suite J113 Austin, TX 78751	Federal Campaign Expense Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	9-07-84	5,000.00
SUBTOTAL of Disbursements This Page (optional)			38,500.00
TOTAL This Period (last page this line number only)			

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EXHIBIT #5

AMERICAN FAMILY POLITICAL
ACTION COMMITTEE
P O BOX 1480
COLUMBUS, GA 31902

№ 1118

2040 2040 05 09-24-84 7 September 05 19 84

61-26/651

PAY TO THE ORDER OF GRAMM FOR SENATE ---------- $ 5,000.00

FIVE THOUSAND AND NO/100 ---------- DOLLARS

First National Bank of Mobile
Affiliate First Bancgroup-Alabama, Inc., Member FDIC
Mobile, Alabama 36601

FOR Texas senatorial general election

Paul Lund
Claire Driver

⑈00001118⑈ ⑆065100262⑆ 013 911 41⑈ ⑈0000500000⑈

SE '84 22

PAY ANY BANK PEG FRS NEW ORLEANS
FRS NEW ORLEANS 14-21
2040 05 09-24-84 4140205205

PAY TO THE ORDER OF TRINITY
TRINITY BANK
BALLAS, TEXAS
FOR DEPOSIT
A NONPROFIT MANUFACTURER
TRINITY
S.A. CORP.
TEXAS
PAY ANY BANK P.E.C.

SE '84 24
PAID
FIRST NATIONAL BANK
MOBILE ALABAMA

SEP 84

8 9 0 4 0 7 4 4 9 4 0

GCC#5761

JOHNSTON, RALPH, REED & CONE
ATTORNEYS AT LAW
2600 TOWER LIFE BUILDING
SAN ANTONIO, TEXAS 78205
TELEPHONE (512) 223-4061

CHESTER H. JOHNSON (1904-1977)
MURRAY L. JOHNSTON JR
THEODORE J. RALPH
RICHARD L. REED
RUSH E. CONE
JAMES J. YATES (MINN. BAR ONLY)
TIMOTHY A. WATT

November 21, 1984

84 NOV 23 AM 11:26

BY FEDERAL EXPRESS

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1837

Dear Mr. Gross:

Enclosed herewith is the designation of counsel by Mrs. H. B. Zachry, Jr., designating Mr. James F. Schoener as Mrs. Zachry's counsel in this matter.

Pursuant to my conversation with Mr. Schoener this morning, it is my understanding that you will accept a written response from Mr. Schoener on behalf of Mrs. Zachry within the extended time allowed for such response, November 30, 1984.

Sincerely,

JOHNSTON, RALPH, REED & CONE

Richard L. Reed

RLR/lw
Enclosure

cc: James F. Schoener, Esq.
Mrs. H. B. Zachry, Jr.

8204074941

ROBERT R. LOWDON
2707 WEST SEVENTH STREET
FORT WORTH, TEXAS 76107

RECEIVED BY THE FEC
GCC#5772
84 NOV 26 A 9:48

November 21, 1984

Mr. Charles N. Steele, General Counsel
Federal Election Commission
Washington, D.C. 20463

FILE: RE: MUR1837

84 NOV 26 P12:05

Gentlemen:

This is in reply to your letter of November 1, 1984, concerning a violation of the Election Act of 1971. I have just returned after having been out of the country for several days and was snowed under with a ton of work to be done at that time. My records indicate that I have not contributed to Phil Gramm more than the allowed amount but have to go back through my cancelled checks to be sure that I did not fail to write one of them down. I would like to have a couple of weeks longer to do this work to be sure that I was in compliance with the regulations.

I tried to call Patty Rielly at (202) 523-4143 but she was out and also her assistant.

Very truly yours,

R. R. LOWDON

mw

9900407449442

HAND DELIVERED
G.C.C.#5764
RECEIVED AT THE FEC

84 NOV 21 P4:50

BAKER & BOTTS
1701 PENNSYLVANIA AVE., N. W.
WASHINGTON, D. C. 20006

TELEPHONE (202) 457-5500

HOUSTON OFFICE
ONE SHELL PLAZA
HOUSTON, TEXAS 77002
TELEPHONE (713) 229-1234

TELECOMMUNICATION
(202) 457-5531 WASHINGTON, D. C.
(713) 229-1523 HOUSTON

November 21, 1984

Ms. Patty Reilly
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1837

Dear Ms. Reilly:

As counsel for the Houston Industries Political Action Committee (HIPAC), I wanted to take this opportunity to respond to the complaint filed by Ms. Donna Mobley on October 30, 1984 that alleges, among other things, that HIPAC's contribution to the primary campaign of Phil Gramm exceeded applicable limits established by the Federal Election Campaign Act of 1971, as amended. 1/ As set forth below, some confusion occurred regarding the allocation of HIPAC's contributions between the primary and general elections because of the timing of Mr. Gramm's announcement that he was a candidate for the Senate. We have now clarified our allocation with the Gramm Campaign with the result that HIPAC's contributions to the primary and general elections of Mr. Gramm are within the limits prescribed by the Act.

By letter dated September 13, 1983, HIPAC transmitted a contribution of $500 to the campaign of Phil Gramm to be reelected to the House of Representatives. The check was made payable to the Phil Gramm Campaign and it was dated September 12, 1983. On September 22, 1983, Mr. Gramm announced his candidacy for the United States Senate.

1/ Paragraph XI of the complaint lists "Hamilton Industries PAC" instead of Houston Industries and also lists a contribution made on November 14, 1984. Without waiving any of its rights to challenge the legal sufficiency of the complaint at a later date, HIPAC assumes for this response that the Complainant intended to refer to Houston Industries and that the contribution referred to was made in 1983, not 1984.

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The $500 contribution was deposited by the Gramm Campaign on November 14, 1983 in Mr. Gramm's Senatorial Campaign Fund. HIPAC, however, did not consider the $500 contribution when it decided in March of 1984 to make a contribution to Mr. Gramm's Senate Campaign. Since it was HIPAC's intent to make the maximum contribution authorized by law to Mr. Gramm's primary election, it transmitted a check for $5,000 to the Gramm Campaign by letter dated April 19, 1984. That contribution was reported received by the Gramm Campaign committee on May 3, 1984.

HIPAC subsequently contributed $4,000 to Mr. Gramm's general election for the Senate, 2/ thus raising its total contributions to Mr. Gramm to $9,500. HIPAC has clarified to the Gramm Campaign its allocation of its contributions as follows: $5,000 to the primary campaign and $4,500 to the general election, both of which are within the limits established by the Act. (A copy of our letter to the Gramm Campaign is attached.)

We hope that this explanation obviates any further involvement of HIPAC in MUR 1837. Should you desire any further information or assistance, please do not hesitate to contact me. My telephone number is (202) 457-5546.

Very truly yours,

J. Patrick Berry

Attorney for
HIPAC

Attachment

2/ The dates and amounts of those contributions were as follows:

May 24, 1984	$1,000
October 11, 1984	$2,000
October 29, 1984	$1,000

9 9 0 4 0 7 4 4 9 4 4

BAKER & BOTTS
1701 PENNSYLVANIA AVE., N. W.
WASHINGTON, D. C. 20006

TELEPHONE (202) 457-5500

HOUSTON OFFICE
ONE SHELL PLAZA
HOUSTON, TEXAS 77002
TELEPHONE (713) 229-1234

TELECOMMUNICATION
(202) 457-5531 WASHINGTON, D. C.
(713) 229-1523 HOUSTON

November 21, 1984

Mr. John Baxter
Treasurer
Phil Gramm Campaign
2355 Stemmons Freeway
Dallas, Texas 75207

RE: HIPAC Contributions

Dear Mr. Baxter:

Because of a recent inquiry from the Federal Election Commission, it has come to the attention of the Houston Industries Political Action Committee (HIPAC) that some confusion exists regarding the allocation of HIPAC's contributions to Mr. Gramm's 1984 election to the United States Senate. This confusion was created because HIPAC made a $500 contribution to Mr. Gramm's reelection to the House before Mr. Gramm announced his intention to run for the Senate. HIPAC subsequently contributed $5,000 to Mr. Gramm's primary election and $4,000 to his general election.

It was the intent of HIPAC in March of 1984 to make the maximum contribution to Mr. Gramm's primary election. Therefore, this letter serves as our request and authorization to allocate the total HIPAC contributions of $9,500 as follows: $5,000 to the primary election and $4,500 to the general election. Per our telephone discussion on this subject today, we understand that you will amend your records to reflect this.

Please do not hesitate to contact me for additional information or assistance.

Thank you for your cooperation.

Very truly yours,

J. Patrick Berry

Attorney for
HIPAC

8904074945

GCC#5196

Tenneco Inc

Tenneco Building
P. O. Box 2511
Houston, Texas 77001
(713) 757-3839

Jerry P. Fortenberry
Corporate Counsel

November 21, 1984

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

Attention: Kenneth A. Gross
Associate General Counsel

Re: FEC MUR 1837, Senator-Elect Phil Gramm

Gentlemen:

This letter is in response to your notification by mail to Tenneco Employees Good Government Fund (herein "TEGGF"), received by TEGGF November 12, 1984, that the Federal Election Commission (herein "FEC") had received a complaint which alleges that TEGGF violated certain sections of the Federal Election Campaign Act of 1971, as amended (herein "the Act"). The undersigned is legal counsel representing TEGGF, and attached is a "Statement of Designation of Counsel" executed by TEGGF.

TEGGF has complied with the letter and the spirit of the Act, together with the FEC Regulations, in every respect. Sworn affidavits of officials of TEGGF, and others acting in its behalf, are attached to demonstrate the care with which TEGGF has conducted itself.

Attached are the following affidavits:

Macon Freeman - Chairman of TEGGF and describing its decisional process in making contributions to Friends of Phil Gramm.

A. J. Pate - Treasurer of TEGGF, describing his issuance of checks payable to Friends of Phil Gramm together with exhibits of copies of the Remittance Advice for each check and both sides of each cancelled check.

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J. S. Brogdon, Jr. -

Chairman of the Tennessee Gas Subcommittee of TEGGF who delivered the $1,000 check to Friends of Phil Gramm, for application to the primary election debt together with a copy of his letter of transmittal as an exhibit.

Michael A. Weiss -

Washington Representative of TEGGF, describing that he ascertained that Friends of Phil Gramm had primary debt, together with a copy of the letter of transmittal of the $4,000 check for application to the primary election debt.

TEGGF did everything that a prudent contributor to retirement of a pre-election debt could do to assure itself that such debt did, in fact, exist. It thoroughly notified Friends of Phil Gramm of the intended purpose of its total $5,000 contribution. This completely discharged the duty of TEGGF in compliance with the Act and applicable FEC Regulations.

No violation of the Act is possible by TEGGF if, in fact, on the dates of the two contributions by TEGGF there were primary debts of Friends of Phil Gramm which TEGGF could help defray. It is improper, therefore, to require TEGGF to respond until such time as the FEC might find a predicate violation of the Act by Friends of Phil Gramm as alleged by the complaint. TEGGF therefore requests that it be deleted as a respondent in MUR 1837 until such time as the FEC might find a predicate violation of the Act.

Further, as evidenced by the attached affidavits, the conduct of TEGGF has been entirely proper. If the FEC should find that Friends of Phil Gramm had no primary election debt sufficient to allow TEGGF to contribute to it for the purpose of debt retirement, no remedy should be assessed against TEGGF. The contributions of TEGGF were all properly labeled as to purpose and therefore were conditioned upon the truth of the representations of Friends of Phil Gramm to TEGGF that there were proper primary election debts to be retired. The acceptance by Friends of Phil Gramm of TEGGF's two checks for retirement of primary debt was the final and conclusive representation to TEGGF that such contributions could be properly received by Friends of Phil Gramm.

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For the reasons set forth above, and upon the facts stated in the attached affidavits, TEGGF asks that FEC dismiss the complaint as to it and remove TEGGF's name as a respondent from MUR 1837.

Sincerely yours,

Jerry P. Fortenberry

JPF/rjh

8904074498

FEDERAL ELECTION COMMISSION

MUR 1837, Senator-Elect Phil Gramm

Affidavit of Macon Freeman

I am Macon Freeman, Chairman of the Tenneco Employees Good Government Fund (hereinafter "TEGGF"). I am employed by Tenneco Inc. as Executive Director of Corporate Advertising Services.

TEGGF did not contribute to the Phil Gramm campaign prior to the Texas primary election held May 5, 1984. Following that election, TEGGF decided that it would contribute the maximum amount allowed by law ($5,000 by TEGGF as a multicandidate committee) to Phil Gramm in the general election to be held November 6, 1984, which it did contribute in five separate checks of $1,000 each as follows:

Check Number	Date	Amount
1641	June 8, 1984	$1,000
1653	June 13, 1984	$1,000
1658	June 20, 1984	$1,000
1756	July 23, 1984	$1,000
1757	July 23, 1984	$1,000

Five separate checks were used in order to accommodate the decisional process of the membership of TEGGF, and is the usual manner of operation of TEGGF. Tenneco Inc. sponsors TEGGF for all of its employees in its eleven separate business units (Tennessee Gas, Tenneco Automotive, Tenneco West, Packaging Corporation, Tenneco Oil E&P, Tenneco Oil P&M, Philadelphia Life, Newport News Shipbuilding, J. I. Case, Southwestern Life and Tenneco Inc. as the parent) that are eligible to be solicited for contributions under the Federal Election Campaign Act. At July 31, 1984 there were approximately 11,000 eligible employees, with the smallest business unit consisting of about 300 employees and the largest about 2,600 employees. All eligible employees are considered to be "members" whether or not they contribute to TEGGF, because the fact of contribution is confidential within the Company and the Treasurer of TEGGF is forbidden to disclose contribution records that would identify individuals to me, any official

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of the Company, or anyone else unless required to do so by law. All requests for contributions to candidates originate with eligible employees of one of the eleven business units, and are forwarded to me for coordination to comply with the requirements of law and goals of TEGGF. As requests are approved, the checks are issued by the TEGGF Treasurer and given to an appropriate eligible employee of the requesting business unit for delivery to the candidates' committees.

As described above, there were approved requests at different dates for five separate contributions to the Phil Gramm general election campaign.

TEGGF also decided that it would likewise make contributions in the maximum amount of $5,000 to the Phil Gramm campaign to retire debts from the primary election, if in fact there were debts from the primary election. In early September, 1984, Bruce B. Conway, an eligible employee of Tenneco Oil E&P, contacted me with the information that in the primary election the Phil Gramm campaign did, in fact, have debts to which TEGGF could contribute. I asked him to verify that fact, and he thereafter informed me that he had checked with Phil Gramm's Campaign office and was assured of the existence of primary debts.

I then, also in early September, contacted Michael A. Weiss, an eligible employee in the Washington, D.C. office of Tenneco Inc., and asked him to verify that the Phil Gramm primary election campaign had debts sufficient to allow TEGGF to contribute a total of $5,000 toward their retirement. Weiss reported to me that he had checked with the Phil Gramm campaign in Washington, D.C. and was informed that such debts existed and a TEGGF contribution in that amount would be proper.

Several Tenneco business units were interested in making a contribution, but due to the late date in relation to the November 6 general election we decided to proceed with only the two business units that had completed their decisional process, Tennessee Gas for $1,000 and Tenneco Inc. for $4,000 (which later, after the decisional process was completed, was apportioned $1,000 by Tenneco Inc., $1,000 by Tenneco Oil E&P, $500 by Tenneco Oil P&M, $500 by Tenneco Automotive, $500 by Southwestern Life and $500 by J. I. Case). The Treasurer of TEGGF was instructed to issue two checks, which he did as follows:

Check Number	Date	Amount
1861	Sept. 27, 1984	$1,000
1874	Sept. 27, 1984	$4,000

The $1,000 check above was given to J. S. Brogdon, Jr., an eligible employee of Tennessee Gas, and the $4,000 check was given to the aforementioned Michael A. Weiss for each to deliver to the Phil Gramm campaign committee. All of the papers supporting the approval process, from the several business units through my office of Chairman and the Treasurer designated these contributions to be for "primary debt" and I instructed that the checks and transmittal letters to the Phil Gramm campaign be so designated.

Macon Freeman

Macon Freeman

Sworn to and subscribed before me on the 21st day of November, 1984.

Regenia J. Harris

REGENIA J. HARRIS
My Commission Expires
May 14, 1985

8904074495-1

FEDERAL ELECTION COMMISSION

MUR 1837, Senator-Elect Phil Gramm

Affidavit of A. J. Pate

I am A. J. Pate, Treasurer of the Tenneco Employees Good Government Fund (hereinafter "TEGGF"). I am employed by Tenneco Inc. as Chief Accountant, Reports and General Accounting.

I have read the affidavit of Macon Freeman, Chairman of TEGGF, and although he recites facts that are beyond my first-hand knowledge, I find his affidavit to be true and consistent with my knowledge as Treasurer.

I received written instructions from the Chairman to issue, and I did issue, each of the following checks:

Check Number	Date	Amount
1641	June 8, 1984	$1,000
1653	June 13, 1984	$1,000
1658	June 20, 1984	$1,000
1756	July 23, 1984	$1,000
1757	July 23, 1984	$1,000

Carbon copies of the above checks are retained in my files, and true copies of those carbon copies are attached to this affidavit as Exhibits A, B, C, D and E. The top portion of each of these exhibits is a copy of the check proper, which is negotiated through banks for payment. The bottom portion is the Remittance Advice which is detached by the payee and retained when the check itself is deposited for payment.

Each of the above-listed checks was negotiated through and paid from TEGGF's bank account. Attached as Exhibits F, G, H, I and J are true copies of the face and back sides of each of these checks returned to TEGGF by its bank upon payment.

The Remittance Advice was absent from each of the above cancelled checks when returned to TEGGF by its bank after

9 0 0 4 0 7 4 9 5 2

payment. I presume each Remittance Advice was retained in the files of the payee, and each Remittance Advice plainly states "U.S. Senate-Texas-General-Federal 1,000.00" as shown on Exhibits A, B, C, D and E.

I received written instructions from the Chairman to issue, and did issue, each of the following checks:

Check Number	Date	Amount
1861	Sept. 27, 1984	$1,000
1874	Sept. 27, 1984	$4,000

Carbon copies of the above checks are retained in my files, and true copies of those carbon copies are attached to this affidavit as Exhibits K and L. The top portion of each of these Exhibits is a copy of the check proper, which is negotiated through banks for payment. The bottom portion is the Remittance Advice which is detached by the payee and retained when the check itself is deposited for payment.

Each of the above-listed checks was negotiated through and paid from TEGGF's bank account. Attached as Exhibits M and N are true copies of the face and back sides of each of these checks returned to TEGGF by its bank upon payment.

The Remittance Advice was absent from each of the above cancelled checks when returned to TEGGF by its bank after payment. I presume each Remittance Advice was retained in the files of the payee, and each Remittance Advice plainly states"Senate-Texas-Primary Debt-Federal 1,000.00" as shown on Exhibit G and "US Senate-Texas-Primary Debt-Federal 4,000.00" as shown on Exhibit H.

Each of the seven checks, upon being prepared by me as Treasurer, was given to the Chairman for his further action in transmittal to the payees.

A. J. Pate

Sworn to and subscribed by me on the 21st day of November, 1984.

Regenia J. Harris

REGENIA J. HARRIS
My Commission Expires
May 14, 19____

8904074955

Tenneco Employees Good Government Fund
(COMPANY)
Houston, Texas

DATE June 8, 1984
VOID AFTER 60 DAYS

VOUCHER NO.

12041

CHECK NO. 1641
$ 1,000.00

PAY

TO THE ORDER OF
Friends for Phil Gramm
c/o Phil Gramm
P. O. Drawer AO
College Station, TX 77840

Tenneco Employees Good Government Fund
NON-NEGOTIABLE

AUDITED BY

APPROVED FOR PAYMENT

RepublicBank Houston
HOUSTON, TEXAS

DATE	INVOICE NO	PARTICULARS	AMOUNT	DISCOUNT	NET
		U S Senate - Texas - General - Federal			1,000.00
		kf			
		Tenneco Employees Good Government Fund			
		TGP 1,000.00			

8204074495 4

0058

TEN 2673 1/75

CHECK NO

Exhibit A

TENNECO

Tenneco Employees Good Government Fund
(COMPANY)
Houston, Texas

DATE 6/13/84
VOID AFTER 60 DAYS

VOUCHER NO.

12053

CHECK NO. 1653
$ 1,000.00

PAY

TO THE ORDER OF
Friends of Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77804

Tenneco Employees Good Government Fund
NON-NEGOTIABLE

AUDITED BY

APPROVED FOR PAYMENT

RepublicBank Houston
HOUSTON, TEXAS

8900407449553

DATE	INVOICE NO	PARTICULARS	AMOUNT	DISCOUNT	NET
		U S Senate - Texas - General - Federal			1,000.00
		kf			
		DOS8			
		NNSDD 1,000.00			

TEN 2673 1/75

CHECK NO

Exhibit B

Tenneco Employees Good Government Fund
(COMPANY)
Houston, Texas

DATE 6/20/84
VOID AFTER 60 DAYS

VOUCHER NO.

12058

CHECK NO. 1658

$1,000.00

PAY

TO THE ORDER OF

Friends for Phil Gramm
C/o Phil Gramm
Drawer A-0
College Station, TX 77840

Tenneco Employees Good Government Fund
NON-NEGOTIABLE

AUDITED BY

APPROVED FOR PAYMENT

RepublicBank Houston
HOUSTON, TEXAS

DATE	INVOICE NO	PARTICULARS	AMOUNT	DISCOUNT	NET
	U S Senate - Texas - General - Federal				1,000.00
	kf				
	TOC-P&M	1,000.00			

0058

TEN 2673 1/75

CHECK NO

Exhibit C

TENNECO

Tenneco Employees Political Government Fund
(COMPANY)
Houston, Texas

DATE July 23, 1984
VOID AFTER 60 DAYS

VOUCHER NO. 12156

CHECK NO. 1756

PAY $1,000.00

TO THE ORDER OF
Friends of Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77840

Tenneco Employees Political Government Fund
NON-NEGOTIABLE

AUDITED BY

APPROVED FOR PAYMENT

RepublicBank Houston
HOUSTON, TEXAS

DATE	INVOICE NO.	PARTICULARS	AMOUNT	DISCOUNT	NET
	U S Senate	- Texas - General - Federal			1,000.00
	kf				
		0058			
		Tenneco Employees Political Government Fund			
	PCA 1,000.00				

890407449557

TEN 2673 1/75

CHECK NO.

Exhibit D

Tennessee Employees Coal Government Fund
(COMPANY)
Houston, Texas

DATE July 23, 1984
VOID AFTER 60 DAYS

VOUCHER NO.

12157

CHECK NO. 1757

PAY $1,000.00

TO THE ORDER OF
Friends of Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77840

Tennessee Employees Coal Government Fund
NON-NEGOTIABLE

AUDITED BY

APPROVED FOR PAYMENT

Republic Bank Houston
HOUSTON, TEXAS

DATE	INVOICE NO	PARTICULARS	AMOUNT	DISCOUNT	NET
	U S Senate	- Texas - General - Federal			1,000.00
	kf				
		0658			
		Tennessee Employees Coal Government Fund			
	TOC-E&P	1,000.00			

8904074958

TEN 2673 1/75

CHECK NO

Exhibit E

Tennoco Employees Good Government Fund
(COMPANY)
Houston, Texas

38121

353
T150

DATE June 8, 1984
VOID AFTER 60 DAYS

VOUCHER NO.

12041

CHECK NO. 1641

PAY ONE THOUSAND AND 00 CTS ...

$ 1,000.00

TO THE ORDER OF
Friends for Phil Gramm
c/o Phil Gramm
P. O. Drawer AO
College Station, TX 77840

Tennoco Employees Good Government Fund

BY J. L. Stoop

BY William E. Stevens Jr.

RepublicBank Houston
HOUSTON, TEXAS

⑈113000036⑈ 01 6071 7⑈ ⑈0000100000⑈

890407449654

35-4 JE '84 19 35-4
PAY ANY BANK P.E.G.
F.R.B. HOUSTON

JE '84 19
PAY ANY BANK P.E.G.
F.R.B. HOUSTON

JE '84 19
PAY ANY BANK P.E.G.
F.R.B. HOUSTON

PAY TO THE ORDER OF
FIRST CITY NATIONAL BANK
OF BRYAN, TEXAS
FRIENDS OF PHIL GRAMM
⑈00-6489-0-01

Exhibit F

Tenneco Employees Good Government Fund
(COMPANY)
Houston, Texas

35-3
1130

DATE 6/13/84
VOID AFTER 60 DAYS

VOUCHER NO.

12053

CHECK NO. 1653

PAY [redacted] 1,000 00 CTS

$ 1,000.00

TO THE ORDER OF

Friends of Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77804

Tenneco Employees Good Government Fund

BY J. L. Stagg

BY William C. Owens, Jr.

RepublicBank Houston
HOUSTON, TEXAS

⑆113000036⑆ 01 6071 7⑈ ⑈0000100000⑈

8 9 0 4 0 7 4 4 9 6 0

J 6 '84 03

PAY TO THE ORDER OF
FOR DEPOSIT ONLY
FRIENDS OF PHIL GRAMM
A NON-PROFIT WASHINGTON DC CORP.
GENERAL ELECTION
J 6 '84 05
RepublicBank Houston N.A.
HOUSTON, TEXAS

32-7130
TRINITY
BANK S.A.
DALLAS
TEXAS
PAY ANY BANK PAR

2 JUL 84

Exhibit G

Tenneco Employees Good Government Fund
(COMPANY)
Houston, Texas

DC PAC

DATE 6/20/84
VOID AFTER 60 DAYS

VOUCHER NO.

12058

CHECK NO. 1658

PAY [redacted] 1,000 00 CTS

$1,000.00

TO THE ORDER OF

Friends for Phil Gramm
c/o Phil Gramm
Drawer A-0
College Station, TX 77840

Tenneco Employees Good Government Fund

BY J. L. Stagg

BY William C. Owens Jr.

RepublicBank Houston
HOUSTON, TEXAS

⑆113000036⑆ 01 6071 7⑈ ⑈0000100000⑈

8 0 4 0 7 4 4 9 6 1

JE '84 30

INTERFIRST BANK

32-7130

JY '84 02

PAY ANY BANK, P.E.S.
INTERFIRST BANK HOUSTON, N.A.
113000515

28 JUN 84

PAY TO THE ORDER OF
UNITY SAVINGS
DALLAS, TEXAS
FOR DEPOSIT ONLY
FRIENDS OF PHIL GRAMM
A NON-PROFIT WASHINGTON DIST. CORP.
GENERAL ELECTION
000 002109 2⑈

'84 02

PAID
REPUBLICBANK HOUSTON N.A.
HOUSTON, TEXAS

Exhibit H

Tenneco Employees Good Government Fund
(COMPANY)
Houston, Texas

38375

35-3
1130

DATE July 23, 1984
VOID AFTER 60 DAYS

VOUCHER NO.

12156

CHECK NO. 1756

PAY [redacted] 1,000 00 CTS

$ 1,000.00

TO THE ORDER OF

Friends of Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77840

Tenneco Employees Good Government Fund

BY J. L. Stagg

BY William E. Owens, Jr.

RepublicBank Houston
HOUSTON, TEXAS

⑆113000036⑆ 01 6071 7⑈ ⑈0000100000⑈

8 9 0 4 0 7 4 4 9 6 2

PAY TO THE ORDER OF
FIRST CITY NATIONAL BANK
OF BRYAN, TEXAS
FRIENDS OF PHIL GRAMM
#00-6489-0-01

35-4 AG '84 22 35-4
PAY ANY BANK P.E.G.
F.N.B. HOUSTON
A 113000049 A

AG '84 22
PAID
REPUBLICBANK HOUSTON N.A.
HOUSTON, TEXAS

2 0 7 5 9 5

Exhibit I

Tenneco Employees Good Government Fund
(COMPANY)
Houston, Texas

DATE July 23, 1984
VOID AFTER 60 DAYS

VOUCHER NO.

12157

CHECK NO. 1757

PAY [redacted] 100000 CTS

$1,000.00

TO THE ORDER OF
Friends of Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77840

Tenneco Employees Good Government Fund

BY J. L. Stagg

BY William C. Owens Jr.

RepublicBank Houston
HOUSTON, TEXAS

⑆113000036⑆ 01 6071 7⑈ ⑈0000100000⑈

8 9 0 4 0 7 4 9 9 5 3

SE '84 18
PAY ANY BANK P.E.G.
INTERFIRST BANK
DALLAS, N.A.

PAY TO THE ORDER OF
TRINITY SAVINGS
DALLAS, TEXAS
FOR DEPOSIT ONLY
FRIENDS OF PHIL GRAMM
A NON-PROFIT WASHINGTON D.C. CORP.
GENERAL ELECTION
800 002109 2⑈

32-7130
TRINITY
BANK, S.A.
DALLAS, TEXAS
PAY ANY BANK P.E.G.
FIRST BANK Houston, N.A.
115000015

17 SEP 84

SE '84 18
PAID
REPUBLICBANK HOUSTON N.A.
HOUSTON, TEXAS

Exhibit J

TENNECO

Tennessee Employees Good Government Fund
(COMPANY)
Houston, Texas

DATE September 27, 1984
VOID AFTER 60 DAYS

VOUCHER NO. 12261

CHECK NO 1861

PAY $1,000.00

TO THE ORDER OF
Friends for Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77840

Tennessee Employees Good Government Fund
NON-NEGOTIABLE
AUDITED BY

APPROVED FOR PAYMENT

RepublicBank Houston
HOUSTON, TEXAS

DATE	INVOICE NO	PARTICULARS	AMOUNT	DISCOUNT	NET
		Senate - Texas - Primary Debt - Federal			1,000.00
		kf			
		Tennessee Employees Good Government Fund			
		TGP 1,000.00			

8900407449564

0058

TEN 2673 1/75

CHECK NO

Exhibit H

Tenneco Employees Good Government Fund
(COMPANY)
Houston, Texas

DATE September 27, 1984
VOID AFTER 60 DAYS

VOUCHER NO.

12274

CHECK NO. 1874

PAY $4,000.00

TO THE ORDER OF
Friends of Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77840

Tenneco Employees Good Government Fund
NON-NEGOTIABLE

AUDITED BY

APPROVED FOR PAYMENT

RepublicBank Houston
HOUSTON, TEXAS

DATE	INVOICE NO	PARTICULARS	AMOUNT	DISCOUNT	NET
		U S Senate - Texas - Primary Debt - Federal			4,000.00
	kf				
		Tenneco Employees Good Government Fund			
		Tenneco Inc. 4,000.00			

6058

TEN 2673 1/75

CHECK NO.

Exhibit L

Tenneco Employees Good Government Fund
(COMPANY)
Houston, Texas

35-3
1130

DATE September 27, 1984
VOID AFTER 60 DAYS

VOUCHER NO.

12261

CHECK NO. 1861

PAY EXACTLY 07622 1,000.00 CTS

$1,000.00

Tenneco Employees Good Government Fund

TO THE ORDER OF
Friends for Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77840

BY J. L. Stagg

BY William C. Owens, Jr.

RepublicBank Houston
HOUSTON, TEXAS

⑆113000036⑆ 01 6071 7⑈ ⑈0000100000⑈

8 9 0 4 0 7 4 9 6 5

OT '84 11

PAY TO THE ORDER OF
TRINITY SAVINGS DALLAS, TEXAS
FOR DEPOSIT ONLY
FRIENDS OF PHIL GRAMM
F.R.B. DALLAS
1110-0003-8

32-7130

OCT 84

OT '84 11

PAID
REPUBLICBANK HOUSTON N.A.
HOUSTON, TEXAS

Exhibit M

Tenneco Employees Good Government Fund
(COMPANY)
Houston, Texas

35-3
1130

DATE September 27, 1984
VOID AFTER 60 DAYS

VOUCHER NO.

12274

CHECK NO. 1874

PAY EXACTLY 07622 400000 CTS

$4,000.00

TO THE ORDER OF

Friends of Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77840

Tenneco Employees Good Government Fund

BY J. L. Stagg

BY William C. Owens, Jr.

RepublicBank Houston
HOUSTON, TEXAS

⑆113000036⑆ 01 6071 7⑈ ⑈0000400000⑈

8 9 0 4 0 7 4 9 9 5 7

35-4 OT '84 11 35-4

F.R.B. HOUSTON

32-7130

TRINITY
BANC, S.A.
DALLAS
TEXAS
PAY ANY BANK, P.E.G.

08 OCT 84

1113 9 8 0 7

OT '84 11

PAID
REPUBLICBANK HOUSTON N.A.
HOUSTON TEXAS

35-3

1110 0000 0

Exhibit N

FEDERAL ELECTION COMMISSION

MUR 1837, Senator-Elect Phil Gramm

Affidavit of J. S. Brogdon, Jr.

I am J. S. Brogdon, Jr., Chairman of the Tennessee Gas Subcommittee of Tenneco Employees Good Government Fund (hereinafter "TEGGF"). I am employed by Tennessee Gas Transmission Company, a subsidiary of Tenneco Inc., as Senior Vice President.

On September 24, 1984 I originated a written request on behalf of eligible employees of Tennessee Gas to TEGGF for a contribution of $1,000 to the Phil Gramm campaign for the purpose of "Primary (Debt Retirement)" and my request was approved. TEGGF delivered to me check number 1861, dated September 27, 1984, payable to Friends for Phil Gramm in the amount of $1,000 for delivery to the payee. The Remittance Advice portion of that check carried the legend "Senate-Texas-Primary Debt-Federal 1,000.00".

I transmitted this check to the Phil Gramm campaign by mailing it with a letter, a true copy of which is attached hereto as Exhibit A, dated October 1, 1984 addressed to Friends for Phil Gramm.

J. S. Brogdon, Jr.

Sworn to and subscribed before me on the 21st day of November, 1984.

Regenia J. Harris

REGENIA J. HARRIS
My Commission Expires
May 14 19 85

8 9 0 4 0 7 4 0 9 6 8

Tennessee Gas Transmission
A Tenneco Company

J. B. Bregdon, Jr.
Senior Vice President

Tenneco Building
P. O. Box 2511
Houston, Texas 77001
(713) 757-3188

October 1, 1984

Friends for Phil Gramm
c/o Phil Gramm
Drawer AO
College Station, TX 77840

Dear Congressman Gramm:

Attached is a check in the amount of $1,000 from the Tennessee Gas Subcommittee of the Tenneco Employees Good Government Fund to be used toward debt retirement for the Primary election.

We are pleased to make this contribution, and wish you good luck in the upcoming General election.

Very truly yours,

Jim Bregdon

JSBjr:tbb

Attachment

89004074499

Exhibit A

FEDERAL ELECTION COMMISSION

MUR 1837, Senator-Elect Phil Gramm

Affidavit of Michael A. Weiss

I am Michael A. Weiss, a Washington Representative of Tenneco Employees Good Government Fund (hereinafter "TEGGF"). I am employed by Tenneco Inc. as Washington Representative.

In September, 1984, I was asked by Macon Freeman, Chairman of TEGGF, to ascertain whether the Phil Gramm campaign had debts from the primary election sufficient to allow TEGGF to lawfully contribute $5,000 to that campaign designated for the retirement of a portion of those debts. I discussed the matter with Ruth Cymber, Assistant Treasurer of Friends of Phil Gramm at her Washington, D.C. office, and she assured me that such debts existed and that contributions from TEGGF in the total amount of $5,000 would be lawful and welcome. I informed Macon Freeman of the result of my inquiry.

On or about October 2, 1984, TEGGF delivered to me its check number 1874, dated September 27, 1984, payable to Friends of Phil Gramm in the amount of $4,000. I prepared a letter, a true copy of which is attached hereto as Exhibit A, dated October 2, 1984 addressed to Representative Gramm and signed by me for the Tenneco Inc. business unit and Robert F. Lockhart as representative of the Tenneco Oil E&P business unit, for transmittal of the check.

On or about October 2, 1984, Robert F. Lockhart and I hand delivered the letter and check to Ruth Cymber at her Washington, D.C. office.

Michael A. Weiss

Michael A. Weiss

Sworn to and subscribed before me on the 26th day of November, 1984.

Thomas W. White

My Commission Expires January 14th, 1986

8 9 0 4 0 7 4 4 9 7 0

Tenneco Employees
Good Government Fund

Tenneco Building
P.O. Box 2511
Houston, Texas 77001
(713) 757-8535

October 2, 1984

Representative Phil Gramm
Friends of Phil Gramm
Drawer AO
College Station, Texas 77804

Dear Representative Gramm:

Enclosed please find our Employees' Good Government Fund check in the amount of $4,000 for your primary campaign debt; additionally, another check in the amount of $1,000 is being forwarded to your campaign for primary debt retirement by a Tenneco subsidiary. With these two checks, the Tenneco Employees' Good Government Fund will have contributed the maximum legal amount to both your primary and general election campaigns.

We wish you well in this important endeavor and look forward to your representing our Texas employees for the next six years and beyond.

Sincerely,

Robert F. Lockhart,
Washington Representative
Tenneco Employees' Good
Government Fund

Michael A. Weiss
Washington Representative
Tenneco Employees' Good
Government Fund

RFL/MAW/kat
Enclosure

8 9 0 4 0 7 4 4 9 7 1

Exhibit "A"

LTEN 121A 3/82

RECEIVED BY THE FEC
GCC# 5816
84 NOV 29 A9:13

Folsom Investments, Inc.
Bent Tree Tower, Suite 800 16475 Dallas Parkway Dallas, Texas 75248-2661 (214) 931-7400

November 22, 1984

Copy

84 NOV 29 A9:58

James F. Schoener, Esq.
MIller, Canfield, Paddock and Stone
1015 15th Street, NW, Suite 1200
Washington, DC 20005

Dear Mr. Schoener:

Reference: MUR-1837 - Robert & Margaret Folsom

Enclosed are Designation of Counsel Forms for both Mr. and Mrs. Folsom. This matter is somewhat confusing to us as we have searched our files and find evidence of only the allowed amount of $1000.00 from each. (copy of our check #6685 dated July 8, 1984).

There was a donation in February of 1983 in the amount of $100.00 (copy of this check is also enclosed).

Please call me at your convenience and we can discuss any questions you may have. Thank you for handling this matter for us.

Very truly yours,

Marie Garrison

Marie Garrison
Executive Vice President

Enc.

8904074497 2

8 9 0 4 0 7 4 4 9 7 3

3333 55807

PAY ANY BANK P.E.G.
FIRST CITY
NATIONAL BANK
88-231 85-231

JUL 11 '84

RECEIVED

38229-2 PB 6685

MercantileBank
Mercantile National Bank at Dallas
PO Box 225415 Dallas, Texas 75265

July 8 1984

PAY TO THE ORDER OF PHIL GRAHAM CAMPAIGN $ 2,000.00

TWO THOUSAND AND No/100----------DOLLARS

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

ROBERT S. FOLSOM

Robert S. Folsom

ROBERT S. FOLSOM
16475 DALLAS PARKWAY, SUITE 800
DALLAS, TEXAS 75248

⑈00006685⑈ ⑆111000614⑆ 307839123⑈ ⑈0000200000⑈

CLARKE CHECKS K

FOR DEPOSIT ONLY
First City National Bank of Bryan 7
COMMITTEE TO RE-ELECT PHIL GRAMM
#00-4292-7
PAYMENT BANK REG.
88-231 88-231
FEB 18 '83

8 9 0 3 0 7 4 4 9 7 4

ROBERT S. FOLSOM
16475 DALLAS PARKWAY, SUITE 800
DALLAS, TEXAS 75248

MercantileBank
Mercantile National Bank at Dallas
PO Box 225415 Dallas, Texas 75265

6353

February 9 1983

PAY TO THE ORDER OF Committee To Re-elect Phil Gramm $100.00

THE SUM 100 DOLS 00 CTS DOLLARS

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

		Contribution		

ROBERT S. FOLSOM

Marie Garrison

⑈00006353⑈ ⑆111000614⑆ 307839123⑈ ⑈0000010000⑈

CLARKE CHECKS - K

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 23, 1984

James F. Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street, N.W.
Suite 1200
Washington, D.C. 20005

Re: MUR 1837
Friends of Phil Gramm et al.

Dear Mr. Schoener:

This is in reference to your letters dated November 15, 1984 and November 19, 1984, which list additional clients you will represent in MUR 1837. Your November 15 letter states that you assume the 30 day extension, granted to you in your capacity as counsel for the Friends of Phil Gramm Committee, will encompass these additional respondents.

After considering this request this Office has decided not to grant this 30 day extension for these additional respondents. The reasons cited by you as requiring the extension for the Committee are not applicable in the cases of these individual respondents. An extension of an additional 15 days for these other respondents has been granted. Accordingly, their responses will be due 15 days later than the statutory period.

The Commission is still considering your earlier motion to allow respondents other than the Committee to avoid responding until after the primary debt is determined. Should that motion be granted your request for an extension as to those respondents would be unnecessary. You will be notified when the Commission makes its determination.

If you have any questions, please contact Patty Reilly, the staff member assigned to this matter, at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074497 5

RECEIVED BY THE FEC
GCL # 5798
84 NOV 27 A8:19

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

November 26, 1984

84 NOV 27 A9:22

Patty Reilly, Esquire
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR 1837

Dear Ms. Reilly:

In accordance with our telephone conversation of November 26, 1984, please grant an extension of time for response for each of the respondents for whom I heretofore filed a Statement of Designation of Counsel, as well as those individuals who have designated me as counsel in a direct communication to your Commission. I ask that this extension of time be granted in order to file a response simultaneously with the principal respondents in this matter.

As I indicated, several other persons that appear on your complaint have not received the complaint from your office, even as of today. Mr. Glenn Edward Roney of McAllen, Texas, is in this category and I request the extension of time for him as well.

Finally, Victor J. Rogers of Beaumont; Mr. Lester Logue of Dallas; Roslyn Canavan of San Antonio; Gene Canavan of San Antonio; R. J. Schumacher of Ft. Worth; Mrs. H. B. Zachry of San Antonio; Peter Gill of San Antonio; Mrs. Merle Stieler of Comfort; and Ms. Elga Rea of Plano, Texas have all advised that their Statements of Designation of Counsel are in the mail but have not yet arrived at my office. I ask for an extension of time for all of these respondents also.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener (cb)
James F. Schoener, Esq.

JFS/cb

8004074979

GCC#5749
5802

COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N. W.
P. O. BOX 7566
WASHINGTON, D. C. 20044

(202) 662-6000
WRITER'S DIRECT DIAL NUMBER

(202) 662-5430

DANIEL M. GRIBBON
STANLEY L. TEMKO
JAMES C. McKAY
JOHN W. DOUGLAS
HAMILTON CAROTHERS
J. BANCROFT WILSON
ROBERTS B. OWEN
EDGAR F. CZARRA, JR.
WILLIAM M. ALLEN
DAVID B. ISBELL
JOHN B. JONES, JR.
PAUL R. DUNN
PHILIP R. STANSBURY
CHARLES A. MILLER
PETER BARTON HUTT
HERBERT DYM
JOHN VANDERSTAR
HARRIS WEINSTEIN
JOHN B. DENISTON
PETER J. NICKLES
JONATHAN D. BLAKE
CHARLES E. BUFFON
ROBERT N. BAYLER
E. EDWARD BRUCE
DAVID N. BROWN
PAUL J. TAGLIABUE
ANDREW W. SINGER
DAVID M. HICKMAN
RUSSELL H. CARPENTER, JR.
NICHOLAS W. PELS
THEODORE L. GARRETT
DANA T. ACKERLY
JOHN M. VINE
JOHN THOMAS SMITH II
JOHN D. RUSSO
CLAUSEN ELY, JR.
RICHARD F. KINGHAM
ROBERT M. SUSSMAN
MICHAEL R. LEVY
GEORGE B. REID, JR.
THOMAS S. WILLIAMSON, JR.
JOHN R. BOLTON
JOANNE B. GROSSMAN
J. MICHAEL HEMMER
GREGORY M. SCHMIDT

HARRY L. SHNIDERMAN
DON V. HARRIS, JR.
WILLIAM STANLEY, JR.
WEAVER W. DUNNAN
EDWIN M. ZIMMERMAN
JEROME ACKERMAN
HENRY P. SAILER
JOHN H. SCHAFER
ALFRED M. MARKS
JOHN LeMOYNE ELLICOTT
DAVID E. McGIFFERT
R. EDWARD DUNKELBERGER, JR.
BRICE McADOO CLAGETT
RICHARD A. BRADY
ROBERT F. O'MALLEY
EUGENE T. LAMBERT
MARK A. WEISS
HARVEY M. APPLEBAUM
MICHAEL S. HORNE
CHARLES T. C. RUFF
MICHAEL BOUDIN
BINGHAM B. LEVERICH
ALLAN TOPOL
VIRGINIA Q. WATKIN
RICHARD D. COPAKEN
CHARLES LISTER
PETER D. THOMOFF
WESLEY S. WILLIAMS, JR.
DORIS D. BLAZER
WILLIAM D. IVERSON
S. WILLIAM LIVINGSTON, JR.
JAMES R. ATWOOD
COLEMAN S. HICKS
STUART C. STOCK
EUGENE D. GULLAND
O. THOMAS JOHNSON, JR.
EUGENE A. LUDWIG
PATRICIA A. BARALD
REEVES C. WESTBROOK
THEODORE VOORHEES, JR.
JEFFREY G. HUVELLE
PAUL J. BERMAN
WILLIAM P. SKINNER
GEORGE M. CHESTER, JR.
RICHARD A. MESERVE

FONTAINE C. BRADLEY
EDWARD BURLING, JR.
HOWARD C. WESTWOOD
CHARLES A. HORSKY
JOHN T. SAPIENZA
JAMES H. McGLOTHLIN
ERNEST W. JENNES
EDWIN S. COHEN
COUNSEL

JOHN SHERMAN COOPER
OF COUNSEL

TWX: 710 822-0005 (CB WSH)
TELEX: 89-593 (COVLING WSH)
TELECOPIER INFORMATION:
(202) 662-6280
CABLE: COVLING

November 26, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1837

Dear Mr. Steele:

This is the response of the Union Pacific Fund for Effective Government ("Union Pacific Fund") to the complaint in the above matter. The complaint alleges that Union Pacific Fund and others violated the Federal Election Campaign Act, as amended, 2 U.S.C. § 431 et seq ("FECA"), by making excessive contributions to Friends of Phil Gramm to retire non-existent primary debt.

FACTS

Union Pacific Fund is a political committee within the meaning of the FECA and the Commission's regulations. Friends of Phil Gramm is the authorized campaign committee for Mr. Gramm's 1984 senatorial campaign.

84 NOV 27 P3:24

8904074977

On July 24, 1984, Union Pacific Fund made a contribution of $5,000 to Friends of Phil Gramm. In its July monthly report, Union Pacific Fund reported this contribution to the Commission, designating it as a contribution for Mr. Gramm's primary election. On August 9, 1984, Union Pacific Fund made a second contribution of $5,000 to Friends of Phil Gramm. It reported this contribution in its August monthly report to the Commission as a general election contribution.[1/]

ARGUMENT

As the complaint itself recognizes, under the Commission's regulations a candidate's authorized campaign committee may only receive contributions to retire primary debt to the extent of net outstanding primary debts. See Complaint at 3; 11 CFR § 110.1(a)(2)(i). The complaint alleges that Friends of Phil Gramm had no net primary debts. It concludes from this that contributions to retire that debt, like Union Pacific Fund's July contribution, were excessive. The complaint therefore raises a simple factual question: whether Friends for Phil Gramm had net primary debts.

1/ Union Pacific Fund's first August monthly report inadvertently reported this second contribution as a primary contribution. On September 19, 1984, Union Pacific Fund amended its August monthly report correctly to reflect that the second contribution was for the general election.

8904074978

Whatever the answer to that question may be, it cannot conceivably result in a violation of the FECA by Union Pacific Fund. If Friends of Phil Gramm had net primary debts, then Union Pacific Fund's July 1984 contribution is perfectly permissible.[2/] If, on the other hand, Friends of Phil Gramm did not have net primary debt (or if it collected contributions in excess of its net primary debts), then the proper procedure under the FECA is for Friends of Phil Gramm to refund the excess July contribution to Union Pacific Fund. E.g., A.O. 1980-122. That is a violation only by Friends of Phil Gramm, not by Union Pacific Fund.

Contributors like the Union Pacific Fund have no way of knowing when a campaign has net primary debts. The Commission's regulations and the FECA impose no requirement that they ascertain that such debts in fact exist. Indeed, it would be impracticable to do so. Where a campaign committee has outstanding net primary debts, it will be soliciting a fairly substantial number of people to retire those debts. It would be impossible for the campaign committee to solicit the precise amount of contributions to retire the debt. If an excess is collected, all that is called for is a refund. The contributors therefore have

---

2/ The complaint concedes that Friends of Phil Gramm may have had net primary debt. Complaint at 3.

9904074979

no obligation independently to ascertain whether such debt exists and its extent, especially when the contributor knows that the candidate will refund any excess.

CONCLUSION

The Commission should find no reason to believe that the Union Pacific Fund has violated any provision of the FECA and should dismiss the complaint immediately insofar as it relates to the Union Pacific Fund.

Respectfully submitted,

Richard A. Brady
Daniel A. Rowley
Attorneys for Union Pacific
Fund for Effective Government

8904074980

RECEIVED AT THE FEC

84 DEC 3 AM 11:08



NFIB® National Federation of Independent Business

The Guardian of Small Business.

Wilson S. Johnson
Chairman of the Board and Director
National Federation of Independent Business

John E. Sloan, Jr.
President, Chief Executive Officer and Director
National Federation of Independent Business

Frank M. Cruger
Vice President and Director
Indiana Manufacturers Supply Co., Inc.
Indianapolis, Indiana

Bruno J. Mauer
Vice President and Director
Rickert Industrial Supply
Milwaukee, Wisconsin

Bruce G. Fielding, CPA
Secretary and Director
Fielding, Locksley & Storek
Mountain View, California

Lucy A. Fontenot
Assistant Secretary
National Federation of Independent Business

Ted L. Kuchenriter, CPA
Treasurer and Chief Financial Officer
National Federation of Independent Business

Ramon E. Billeaud
Director
J. B. Levert Land Co.
New Orleans, Louisiana

Richard S. Briggs
Director
Integrated Handling Systems
Menlo Park, California

Jerry J. Chicone, Jr.
Director
Chicone Groves Processes
Orlando, Florida

James S. Herr
Director
Hint's Potato Chips, Inc.
Washington, Pennsylvania

Gordon L. Stone
Director
Stonehouse Signs, Inc.
Arvada, Colorado

Dick Fisher, CAE
General Manager
National Federation of Independent Business

November 26, 1984

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1837

Dear Mr. Gross:

This letter is in response to your letter dated November 1, 1984 regarding MUR 1837. We do not plan to be represented by counsel in this matter at this time, however, we reserve the right to retain counsel at any future time if we feel our interests are in jeopardy.

MUR 1837 is about campaign contributions to the Friends of Phil Gramm Committee for the 1984 primary and general elections. The NFIB Free Enterprise Political Action Committee voted to give maximum campaign contributions in both the primary and general campaigns to the Friends of Phil Gramm Committee. This was because Phil Gramm has supported the interests supported by the NFIB Free Enterprise Political Action Committee. I am enclosing a schedule of contributions to the primary and general elections. I am also submitting copies of the reports which were filed with your office supporting those contributions.

The Committee wished to support Phil Gramm to the maximum amount allowable under FEC guidelines, and for that reason some campaign contributions were reclassified. We did not check

150 West Twentieth Avenue
San Mateo, California 94403
415 341 7441

8 9 0 4 0 7 4 4 9 8 1

with his campaign committee to determine if additional funds were required for primary debt.

If you need any further information on this matter, please feel free to contact me.

Sincerely,

T. L. KUCHENRITER
Treasurer

TLK:jsa
Attach.

cc: NFIB Free Enterprise PAC Committee Members - w/o attach.
Patty Reilly, FEC - w/o attach.

8904074499842

NFIB® Political Action Committee

A Voluntary Nonpartisan Political Contribution Fund of
the National Federation of Independent Business

SUMMARY: Phil Gramm Contributions 1983-1984

			TOTALS	
1983			Primary	General
2/2/83	$500	Special Election		
9/17/83	$1,000	Primary	$1,000	
1984				
3/12/84	1,000	Primary	2,000	
7/12/84	2,500	Primary	4,500	
7/12/84	500	General		$ 500
9/7/84	4,000	General		4,500
10/9/84	500	Primary	5,000	
10/9/84	500	General		5,000

See attached Disbursement Report sheets

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

Sent Reg. Rec't. 10/19/84

(Summary Page)

ALIGN AREA

1. Name of Committee (In Full)

NFIB Free Enterprise Political Action Committee
(National Federation of Independent Business)

Address (Number and Street)

150 W. 20th Avenue

City, State and ZIP Code

San Mateo, CA 94403

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C00101105

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 Election (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
5 Covering Period 10-1-84 through 10-17-84		
6 (a) Cash on hand January 1, 19 84		$ 54,613.45
(b) Cash on Hand at Beginning of Reporting Period	$ 46,811.14	
(c) Total Receipts (from Line 18)	$ 1,060.00	$ 167,047.69
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 47,871.14	$ 221,661.14
7 Total Disbursements (from Line 28)	$ 45,000.00	$ 218,790.00
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 2,871.14	$ 2,871.14
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

T.L. Kuchenriter
Type or Print Name of Treasurer

T.L. Kuchenriter
SIGNATURE OF TREASURER

10/18/84
Date

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

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

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

FEC FORM 3X (3/80)

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PAC00506

FEDERAL POLITICIAL ACTION COMMITTEE
PAC FUNDS DISBURSED

MI006R	TOM									
	RITTER	T	F	H			PRIOR YTD AMT	2,000.00		
	TOM RITTER				2192	10/09/84	CURRENT AMT	1,000.00	FOR GENERAL ELECTION	
	RITTER FOR CONGRESS COMMITTEE						CURRENT YTD	3,000.00	MI-006	
	6674 DIXIE HIGHWAY									
	CLARKSTOWN MI 48016									
NC R	JESSE									
	HELMS	J	F	S			PRIOR YTD AMT	6,000.00		
	JESSE HELMS				2193	10/09/84	CURRENT AMT	2,500.00	FOR PRIMARY ELECTION	
	HELMS FOR SENATE COMMITTEE						CURRENT YTD	8,500.00	NC SENATE	
	P O BOX 177000									
	RALEIGH NC 27619									
NC R	JESSE									
	HELMS	J	F	S			PRIOR YTD AMT	8,500.00		
	JESSE HELMS				2194	10/09/84	CURRENT AMT	2,500.00	FOR GENERAL ELECTION	
	HELMS FOR SENATE COMMITTEE						CURRENT YTD	9,000.00	NC SENATE	
	P O BOX 177000									
	RALEIGH NC 27619									
SD R	LARRY									
	PRESSLER	L	F	S			PRIOR YTD AMT			
	LARRY PRESSLER				2195	10/09/84	CURRENT AMT	1,000.00	FOR GENERAL ELECTION	
	PRESSLER FOR SENATE						CURRENT YTD	1,000.00	SD SENATE	
	RURAL ROUTE									
	HUMBOLDT SD 57035									
TX R	PHIL									
	GRAMM	P	F	S			PRIOR YTD AMT	8,000.00		
	PHIL GRAMM				2196	10/09/84	CURRENT AMT	1,500.00	FOR PRIMARY ELECTION	
	PHIL GRAMM FOR SENATE COMM.						CURRENT YTD	9,500.00	TX SENATE	
	5555 NORTH LAMAR STE. 8109									
	AUSTIN TX 78751									
TX R	PHIL									
	GRAMM	P	F	S			PRIOR YTD AMT	9,500.00		
	PHIL GRAMM				2197	10/09/84	CURRENT AMT	500.00	FOR GENERAL ELECTION	
	PHIL GRAMM FOR SENATE COMM.						CURRENT YTD	10,000.00	TX SENATE	
	5555 NORTH LAMAR STE. 8109									
	AUSTIN TX 78751									
AK001R	DON									
	YOUNG	D	F	H			PRIOR YTD AMT	250.00		
	DON YOUNG				2198	10/09/84	CURRENT AMT	250.00	FOR GENERAL ELECTION	
	ALASKANS FOR DON YOUNG						CURRENT YTD	500.00	AK-001	
	BOX 298									
	ANCHORAGE AK 99510									
MN006R	PAT									
	TRUEMAN	P	F	H			PRIOR YTD AMT	2,000.00		
	PAT TRUEMAN				2199	10/09/84	CURRENT AMT	500.00	FOR GENERAL ELECTION	
	TRUEMAN FOR CONGRESS COMMITTEE						CURRENT YTD	2,500.00	MN-006	
	405 DIVISION									
	BUFFALO MN 55313									

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REPORT
PAC005OC

NATIONAL FEDERATION OF INDEPENDENT BUSINESS
FEDERAL POLITICIAL ACTION COMMITTEE
ADJUSTMENTS TO DISBURSEMENTS

DATE 10/18/84 AT 11:38 AM PAGE 1

TX R PHIL
GRAMM P F S
PHIL GRAMM 2196
PHIL GRAMM FOR SENATE COMM.
5555 NORTH LAMAR STE. 8109
AUSTIN TX 78751

PRIOR YTD AMT 10,000.00
ADJUSTMENT 1,500.00- FOR PRIMARY ELECTION
CURRENT YTD 8,500.00 ADJ TO BALANCE MAX CONTRIB.

Note: Adjustment - reverses original entry of #2196

1 ADJUSTMENTS, TOTAL AMOUNT OF ADJUSTMENTS $1,500.00-

8 9 0 4 0 7 4 4 9 8 7

REPORT
PAC0050b

NATIONAL FEDERATION OF INDEPENDENT BUSINESS
FEDERAL POLITICIAL ACTION COMMITTEE
PAC FUNDS DISBURSED

DATE 10/18/84 AT 11:38 AM PAGE 1

TX R PHIL
GRAMM P F S
PHIL GRAMM
PHIL GRAMM FOR SENATE COMM.
5555 NORTH LAMAR STE. 9109
AUSTIN TX 78751

2250 10/09/84

PRIOR YTD AMT 9,500.00
CURRENT AMT 500.00
CURRENT YTD 9,000.00

FOR PRIMARY ELECTION
TX SENATE

place # 136

1 DISBRUSEMENTS, TOTAL AMOUNT OF DISBURSEMENTS $500.00

Sent Reg. Rec't 10/19/84

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

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (In Full)

NFIB Free Enterprise Political Action Committee
(National Federation of Independent Business)

Address (Number and Street)

150 W. 20th Avenue

City, State and ZIP Code

San Mateo, CA 94403

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C00101105

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 September, 1984
☐ 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
5. Covering Period 9-1-84 through 9-30-84		
6. (a) Cash on hand January 1, 19 84		$ 54,613.45
(b) Cash on Hand at Beginning of Reporting Period	$ 133,171.45	
(c) Total Receipts (from Line 18)	$ 8,139.69	$165,987.69
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 141,311.14	$220,601.14
7. Total Disbursements (from Line 28)	$ 94,500.00	$173,790.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 46,811.14	$ 46,811.14
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

T.L. Kuchenriter
Type or Print Name of Treasurer

T.L. Kuchenriter
SIGNATURE OF TREASURER

10/15/84
Date

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

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

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

FEC FORM 3X (3/80)

8904074983

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[illegible]

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	PRIOR YTD AMT			
					CURRENT AMT	[illegible]	✓ FOR GENERAL ELECTION	OK
					CURRENT YTD	[illegible]	[illegible] SENATE	
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	PRIOR YTD AMT			
					CURRENT AMT	[illegible]	✓ FOR PRIMARY ELECTION	OK
					CURRENT YTD	1,000.00	[illegible] SENATE	
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	PRIOR YTD AMT	[illegible]		
					CURRENT AMT	4,000.00	✓ FOR GENERAL ELECTION	OK
					CURRENT YTD	5,000.00	MN SENATE	
[illegible]	[illegible]	[illegible]	[illegible]	2171 09/07/84	PRIOR YTD AMT	[illegible]		
					CURRENT AMT	4,000.00	✓ FOR GENERAL ELECTION	OK
					CURRENT YTD	[illegible]	TX SENATE	
AR	D	DAVID			PRIOR YTD AMT			
		PRYOR			CURRENT AMT	2,000.00	✓ FOR GENERAL ELECTION	OK
		DAVID PRYOR		2156 09/07/84	CURRENT YTD	2,000.00	AR SENATE VOTE 8/23 3-Y;2-N	
WV	R	JOHN			PRIOR YTD AMT			
		[illegible]			CURRENT AMT	2,000.00	✓ FOR GENERAL ELECTION	OK
		[illegible]		[illegible]	CURRENT YTD	[illegible]	WV SENATE	
MT	D	MAX			PRIOR YTD AMT			
		BAUCUS			CURRENT AMT	[illegible]	✓ FOR GENERAL ELECTION	OK
		MAX BAUCUS		[illegible]	CURRENT YTD	[illegible]	MT SENATE	
[illegible]	[illegible]	[illegible]			[illegible]	[illegible]		
					[illegible]	[illegible]	✓ [illegible]	OK
					[illegible]	[illegible]	[illegible]	

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

(Summary Page)

ALIGN AREA

1. Name of Committee (In Full)

NFIB/FREE ENTERPRISE POLITICAL ACTION COMMITTEE
(NATIONAL FEDERATION OF INDEPENDENT BUSINESS)

Address (Number and Street)

150 W. 20th AVENUE

City, State and ZIP Code

SAN MATEO, CA. 94403

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00101105

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 JULY 1984
☐ 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
5. Covering Period 7-1-84 through 7-31-84		
6. (a) Cash on hand January 1, 19 81		$ 54,613.45
(b) Cash on Hand at Beginning of Reporting Period	$ 66,371.26	
(c) Total Receipts (from Line 18)	$ 5,537.38	$ 89,485.19
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 75,205.64	$ 144,098.64
7. Total Disbursements (from Line 28)	$ 9,500.00	$ 75,390.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 65,708.64	$ 65,708.64
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

T L KUCHENRITER
Type or Print Name of Treasurer

SIGNATURE OF TREASURER _____ Date _____

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

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U S C § 437g

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

FEC FORM 3X (3/80)

89040744991

NATIONAL FEDERATION OF INDEPENDENT BUSINESS
FEDERAL POLITICIAL ACTION COMMITTEE
PAC FUNDS DISBURSED

TX	R	PHIL GRAMM	P	F S	2083 07/12/84	PRIOR YTD AMT	1,000.00	
		PHIL GRAMM				CURRENT AMT	2,500.00	FOR PRIMARY ELECTION
		PHIL GRAMM FOR SENATE COMM.				CURRENT YTD	3,500.00	TX SENATE
		5555 NORTH LAMAR STE. 8109						
		AUSTIN TX 78751						
TX	R	PHIL GRAMM	P	F S	2083 07/12/84	PRIOR YTD AMT	3,500.00	
		PHIL GRAMM				CURRENT AMT	500.00	FOR GENERAL ELECTION
		PHIL GRAMM FOR SENATE COMM.				CURRENT YTD	4,000.00	TX SENATE
		5555 NORTH LAMAR STE. 8109						
		AUSTIN TX 78751						

2 DISBRUSEMENTS, TOTAL AMOUNT OF DISBURSEMENTS $3,000.00

March 1 revised copy

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

(Summary Page)

1. Name of Committee (in Full)

NFIB POLITICAL ACTION COMMITTEE (National Federation of Independent Business)

Address (Number and Street)

150 W. 20th Avenue

City, State and ZIP Code

San Mateo CA 94403

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00101105

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 March, 1984
☐ 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? Lines 6c,d and 8 onl
☒ YES ☐ NO

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 3-1-84 Through 3-31-84		
6. (a) Cash on Hand January 1, 19 84		$ 54,613.45
(b) Cash on Hand at Beginning of Reporting Period	$ 51,280.56	
(c) Total Receipts (from Line 18)	$ 1,302.33	$ 2,759.44
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	$ 52,582.89	$ 57,372.89
7. Total Disbursements (from Line 28)	$ 25,800.00	$ 30,590.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	$ 26,782.89	$ 26,782.89
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	$ 486.00	
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.

T. L. KUCHENRITER
Type or Print Name of Treasurer

T L Kuchenriter
SIGNATURE OF TREASURER

May 17, 1984
Date

For further information, contact:

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

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

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

FEC FORM 3X (3/80)

7 6 6 6 4 4

STICK POSTAGE STAMPS TO ARTICLE TO COVER ... CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL ...

... postmarked stick the gummed stub on the left portion of the address side ... service window of ...

8 9 0 4 0 7 4 4 9 9 3

REPORT
PAC0010

[illegible] PAC FUNDS MISSURGED

DATE 03/1[illegible] AT 10:1[illegible] AM PAGE [illegible]

LA / D BENNETT
JOHNSON
J. BENNETT JOHNSON
JOHNSON FOR SENATE COMMITTEE
5000 FIDELITY [illegible]
BATON ROUGE LA [illegible]

F.E. 7303

PRIOR YTD AMT
1999 03/12/84 CURRENT AMT 1,000.00 FOR PRIMARY ELECTION
CURRENT YTD 1,000.00 LA SENATE

MS / R THAD
COCHRAN
THAD COCHRAN
COCHRAN FOR SENATE COMMITTEE
P O BOX [illegible]
JACKSON MS [illegible]

F.E. 7307

PRIOR YTD AMT
1999 03/12/84 CURRENT AMT 2,000.00 FOR PRIMARY ELECTION
CURRENT YTD 2,000.00 MS SENATE

NH / R GORDON
HUMPHREY
GORDON HUMPHREY
HUMPHREY [illegible]
170 SOUTH RIVER ROAD
BEDFORD NH [illegible]

F.E. 7307

PRIOR YTD AMT
2000 03/12/84 CURRENT AMT ~~2,000.00~~ FOR PRIMARY ELECTION
CURRENT YTD 2,000.00 NH SENATE

S/B 1,000. Corrected 3/16 P/o attached

NC / R JESSE
HELMS
JESSE HELMS
HELMS FOR SENATE COMMITTEE
P O BOX 177[illegible]
RALEIGH NC [illegible]

F.E. 7307

PRIOR YTD AMT
2001 03/12/84 CURRENT AMT ~~1,000.00~~ FOR PRIMARY ELECTION
CURRENT YTD 1,000.00 NC SENATE

S/B 2,000. Corrected 3/16 P/o attached

TX / R PHIL
GRAMM
PHIL GRAMM
PHIL GRAMM FOR SENATE COMM.
5000 NORTH LAMAR [illegible]
AUSTIN TX [illegible]

F.E. 7307

PRIOR YTD AMT
2002 03/12/84 CURRENT AMT 1,000.00 FOR PRIMARY ELECTION
CURRENT YTD 1,000.00 TX SENATE

TX / D KENT
HANCE
KENT HANCE
HANCE FOR SENATE COMMITTEE
1101 NUECES STREET
AUSTIN TX [illegible]

F.E. 7308

PRIOR YTD AMT [illegible]
2003 03/12/84 CURRENT AMT 1,500.00 FOR PRIMARY ELECTION
CURRENT YTD 2,000.00 TX SENATE

MI / R JIM
DUNN
JIM DUNN
[illegible]
[illegible]
[illegible]

F.E. 7307

PRIOR YTD AMT
[illegible] 03/12/84 CURRENT AMT 1,000.00 FOR PRIMARY ELECTION
CURRENT YTD 1,000.00 MI SENATE

[illegible]
[illegible]
[illegible]
[illegible]
[illegible]

F.E. 7307

PRIOR YTD AMT
[illegible] CURRENT AMT [illegible] FOR PRIMARY ELECTION
CURRENT YTD [illegible]

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

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (In Full)

NFIB POLITICAL ACTION COMMITTEE

Address (Number and Street)

150 West 20th Avenue

City, State and ZIP Code

San Mateo, CA 94403

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00101105

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 11/8/83 in the State of Washington
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period 7-1-83 through 10-19-83		
6 (a) Cash on hand January 1, 19__		$ 8,665.33
(b) Cash on Hand at Beginning of Reporting Period	$ 47,245.10	
(c) Total Receipts (from Line 18)	$ 6,749.77	$ 60,429.54
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 53,994.87	$ 69,094.87
7 Total Disbursements (from Line 28)	$ 15,425.00	$ 30,525.00
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 38,569.87	$ 38,569.87
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ 381.00	
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

T.L. Kuchenriter, Treasurer
Type or Print Name of Treasurer

T.L. Kuchenriter
SIGNATURE OF TREASURER

10-24-83
Date

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

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

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

FEC FORM 3X (3 80)

8004074904

REPORT
PAC08S08

NATIONAL FEDERATION OF INDEPENDENT BUSINESS
FEDERAL POLITICIAL ACTION COMMITTEE
PAC FUNDS DISBURSED

TX006R PHIL
GRAMM P F H
PHIL GRAMM 1952 09/07/83
COMM. TO RE-ELECT PHIL GRAMM
4406 CHESAPEAKE ST. NW
WASHINGTON DC 20016

PRIOR YTD AMT 500.00
CURRENT AMT 1,000.00 FOR PRIMARY ELECTION
CURRENT YTD 1,500.00 TX-006

1 DISBRUSEMENTS, TOTAL AMOUNT OF DISBURSEMENTS $1,000.00

[redacted]ORT OF RECEIPTS AND DISBURSEMEN[redacted]

For a Political Committee Other Than an Authorized [redacted]committee

(Summary Page)

ALIGN AREA | | ALIGN AREA

1 Name of Committee (In Full)

C00101105 B20914
THEODORE LOUIS KUCHENRITER
NFIB POLITICAL ACTION COMMITTE
E
150 WEST TWENTIETH AVENUE
SAN MATEO CA 94403

City, State and ZIP Code

☐ Check here if address is different than previously reported.

2 FEC Identification Number

C00101105

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 _____ (Type of Election)
election on _____ in the State of _____
☒ Thirtieth day report following the General Election
on Feb. 12, 1983 the State of Texas
☐ Termination Report

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period 1 - 1 - 83 through 3 - 4 - 83		
6.(a) Cash on hand January 1, 19 83		$ 8,665.33
(b) Cash on Hand at Beginning of Reporting Period	$ 8,665.33	
(c) Total Receipts (from Line 18)	$ 853.39	$ 853.39
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 9,518.72	$ 9,518.72
7 Total Disbursements (from Line 28)	$ 1,500.00	$ 1,500.00
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 8,018.72	$ 8,018.72
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ 50.30	
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

T. L. Kuchenriter, Treasurer
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

March 14, 1983
Date

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

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

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

FEC FORM 3X (3/80)

8904074999

8 9 0 4 0 7 4 4 9 9 7

1861

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 29, 1984

William H. Schweitzer, Esquire
Baker & Hostetler
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

Re: MUR 1837
National Association of Home
Builders BUILD Political Action
Committee (BUILDPAC)

Dear Mr. Schweitzer:

This is in reference to your letter dated November 15, 1984, requesting an extension in the above matter. After considering the circumstances set forth in your letter, your requested extension has been granted. Accordingly, your response is due on December 7, 1984.

If you have any questions, please contact Patty Reilly, the staff member assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8900407449 98

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 29, 1984

Donald F. Santa, Jr., Esquire
Andrews & Kurth
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Re: MUR 1837
Robert L. Bradley

Dear Mr. Santa:

This is in response to your letter dated November 16, 1984, requesting an extension in the above matter. After considering the circumstances set forth in your letter, your requested extension has been granted. Accordingly, your response is due on December 7, 1984.

If you have any questions, please contact Patty Reilly, the staff member assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074499

GCC# 5801

LAW OFFICES
BEVERIDGE & DIAMOND, P. C.
1333 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20036

(202) 828-0200
TELECOPIER(202)828-0234
WRITER'S DIRECT DIAL NUMBER

(202) 828-0281

BEVERIDGE & DIAMOND
SUITE 2506
101 PARK AVENUE
NEW YORK, N.Y. 10178
(212) 557-3355

JIM J. TOZZI
CONSULTING ECONOMIST

HENRY L. DIAMOND
ALBERT J. BEVERIDGE, III
GARY H. BAISE
HAROLD HIMMELMAN
CHRISTOPHER H. BUCKLEY, JR.
EDWARD H. FORGOTSON
J. MARSHALL COLEMAN
STEPHEN L. GORDON
JONATHAN Z. CANNON
ALEXANDER W. SIERCK
JOHN N. HANSON
ANDREW E. MISHKIN
GAINES GWATHMEY, III
CYNTHIA A. LEWIS
KARL S. BOURDEAU
JOHN S. GUTTMANN
STEPHEN R. MELTON
DON G. SCROGGIN
AMY L. EDWARDS
ROBERT BRAGER
JOHN R. ELDRIDGE
RICHARD S. DAVIS
THOMAS RICHICHI
CHRISTINA T. SIMMONS
DEAN H. CANNON
VIRGINIA S. ALBRECHT
PAUL E. SHORB, III
ELISABETH A. ROBINSON

CARL EARDLEY
OF COUNSEL

November 27, 1984

84 NOV 27 P2:49

Ms. Patty Reilly
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20643

Re: MUR 1837

Dear Ms. Reilly:

Enclosed is the affidavit of Mr. Louis A. Beecherl, Jr., along with copies of the checks constituting his contribution to Phil Gramm's campaigns. As stated in the affidavit, Mr. Beecherl contributed $1,000 to Phil Gramm for Congress in March, 1984. He also contributed $1,000 to the Gramm senatorial campaign--through his contribution to the Presidential Nomination Breakfast Ball--on August 8, 1984. These were his only campaign contributions to Phil Gramm. He therefore cannot possibly be said to have violated the Federal Election Campaign Act or the regulations promulgated thereunder.

As noted in the affidavit, Mrs. Beecherl also contributed to the Gramm campaigns. Her contributions are not listed in Exhibit 4, however, and it is possible that the Gramm election committee made an error in accounting and credited some or all of Mrs. Beecherl's contributions to Mr. Beecherl. While we can only surmise about the cause of the accounting error, one thing is certain--Mr. Beecherl did not violate the Federal Election Campaign Act.

Mr. Beecherl was disturbed by receipt of the Federal Election Commission notice and is unaccustomed to legal process against him in his personal capacity. Your expeditious resolution of this issue would therefore be greatly appreciated.

Cordially,

Robert Brager

RB/bjd
Enc.

RE: MUR 1837

I, Louis A. Beecherl, Jr., of 3801 Beverly Drive, Dallas, Texas 75205, do hereby swear, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I have received notification from the Federal Election Commission that a complaint has been filed against Senator-elect Phil Gramm and others. This complaint alleges certain violations of the Federal Election Campaign Act. I understand that I received notification because my name appears in Exhibit 4 to the complaint. According to page 2 of the complaint, exhibit 4 is "[a] copy of the entries from the Gramm reports for those individuals and PAC's who have given the Gramm campaign more than the respective $1,000 and $5,000 contribution limits since May 5, 1984."

2. Exhibit 4 does not accurately reflect my contribution to the Gramm campaign. On March 13, 1984, I wrote one check, for $1,000, to Phil Gramm for Congress. On August 8, 1984, I contributed $1,500 to the Presidental Nomination Breakfast Ball, with the understanding that $1,000 of this $1,500 would go to Phil Gramm's campaign. These checks were my only contributions to the Gramm campaign. Copies of these checks are affixed as Attachment 1.

3. On March 13, 1984, my wife Julie Beecherl also contributed $1,000 to Phil Gramm for Congress. On August 8, 1984, my wife contributed $1,500 to the Presidential Nomination Breakfast Ball with the understanding that $1,000 of this $1,500 would go to Phil Gramm's campaign. A copy of her check is included in Attachment 1.

Further affiant sayeth not.

Louis A. Beecherl, Jr.

Nov. 26, 1984
Date

8904074300 1

LOUIS A. BEECHERL, JR.
3801 BEVERLY DR. 521-0521
DALLAS, TEXAS 75205

DB

2683

August 8, 19 84

32-93
1110

PAY TO THE ORDER OF Presidential Nomination Breakfast Ball $ 1,500.00

THE SUM 1500 DOLS 00 CTS DOLLARS

InterFirst
Interfirst Bank Park Cities
P.O. Box 8367, Dallas, Texas 75205

THIS CHECK IS DELIVERED FOR PAYMENT ON THE FOLLOWING ACCOUNT

1984	Federal political contribution		

LOUIS A. BEECHERL, JR.

Louis A. Beecherl Jr.

⑈002683⑈ ⑆111000931⑆ ⑈ 01 2202 8⑈ ⑈0000150000⑈

8900407430002

MRS. L. A. BEECHERL, JR.
3801 BEVERLY DRIVE PH. 521-0521
DALLAS, TEXAS 75205

PM

3114

August 8, 19 84

32-93
1110

PAY TO THE ORDER OF Presidential Nomination Breakfast Ball $ 1,500.00

One thousand five hundred and no/100's DOLLARS

InterFirst
Park Cities Bank
P O Box 8367, Dallas, Texas 75205

MEMO 1984 Fed. pol. contrbn.

Louis A. Beecherl Jr.

⑆111000931⑆ ⑈ 01 2202 8⑈ 3114 ⑈0000150000⑈

PAY TO THE ORDER OF
TRINITY SAVINGS
DALLAS, TEXAS
FOR DEPOSIT ONLY
FRIENDS OF PHIL GRAMM NO. 1
A NON PROFIT WASHINGTON D.C. CORP.
800 002170 2⑈

2229 8 6 1 7

TRINITY
BANC, S.A.
DALLAS
TEXAS
PAY ANY BANK, P.E.G.
32-7130

22 AUG 84

021222555

PAY TO THE ORDER OF
TRINITY SAVINGS
DALLAS, TEXAS
FOR DEPOSIT ONLY
FRIENDS OF PHIL GRAMM NO. 1
A NON PROFIT WASHINGTON D.C.
800 002170 2⑈

2229 8 6 1 6

TRINITY
BANC, S.A.
DALLAS
TEXAS
PAY ANY BANK, P.E.G.
32-7130

22 AUG 84

021222554

8 9 0 4 0 7 4 5 0 0 0

DHO

LOUIS A. BEECHERL, JR.
3801 BEVERLY DR. 521-0521
DALLAS, TEXAS 75205

37252-16 2547

32-93
1110

March 13, 19 84

PAY TO THE ORDER OF Phil Gramm for Congress $ 1,000.00

THE SUM ONE THOUSAND DOLS 00 CTS DOLLARS

InterFirst
Interfirst Bank Park Cities
P.O. Box 8367, Dallas, Texas 75205

THIS CHECK IS DELIVERED FOR PAYMENT ON THE FOLLOWING ACCOUNTS

1984	Political Contribution		

LOUIS A. BEECHERL, JR.

Louis A Beecherl Jr.

⑈002547⑈ ⑆111000931⑆ ⑈ 01 2202 8⑈ ⑈0000100000⑈

8 9 0 4 0 7 4 5 0 0 4

DHO

MRS. L. A. BEECHERL, JR.
3801 BEVERLY DRIVE PH. 521-0521
DALLAS, TEXAS 75205

37252-14 3101

March 13, 19 84

32-93
1110

PAY TO THE ORDER OF Phil Gramm for Congress $ 1,000.00

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

InterFirst
Park Cities Bank
P O Box 8367, Dallas, Texas 75205

MEMO '84 Pol. Contrib.

Louis A Beecherl Jr

⑆111000931⑆ ⑈ 01 2202 8⑈ 3101 ⑈0000100000⑈

4444 60833

Pay to the Order of
First City National Bank
of Bryan, Texas
Friends of Phil Gramm
#00-4292-7-01

88-231 88-231

APR -6 '84

AP '84
F.R.B. DALLAS
1110-0003-8
32-3
P.E.G.
PAY ANY
BANK

4444 60831

Pay to the Order of
First City National Bank
of Bryan, Texas
Friends of Phil Gramm
#00-4292-7-01

88-231

APR -6 '84

AP '84
F.R.B. DALLAS
1110-0003-8
32-3
P.E.G.
PAY ANY
BANK

8904074500 5

RECEIVED AT THE FEC
GCC#5849
84 DEC 3 A10:29

CENTRE DEVELOPMENT CO., INC.

ROBERT L. TRIMBLE
Executive Vice President
& General Counsel

84 NOV 2 P12:12

November 29, 1984

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

Re: MUR 1837

Gentlemen:

Today I received your letter dated November 1, 1984 addressed to Robert L. Triable (sic), Post Office Box 8020089 (sic), Dallas, Texas 75380 along with a copy of a complaint supposedly filed against me with the Federal Election Commission. This letter is in response thereto.

First, I can not ascertain from a reading of the complaint that I am one of the persons against whom the complaint is lodged. My only involvement with Phil Gramm was to send him a check for $2,000.00 on September 17, 1984 as a campaign contribution from myself for $1,000.00 and my wife for $1,000.00. I am enclosing herewith a copy of the check and a copy of my transmittal letter sending my contribution to the "Friends of Phil Gramm".

Surely this will eliminate me from any further involvement in this matter but should you need additional information or should you consider me as remaining involved, please advise.

Sincerely,

ROBERT L. TRIMBLE

RLT:ml:A82

enclosures

Mailing address: P.O. Box 802087 • Dallas, Texas 75380-2087 • (214) 980-8080
Delivery address: 4050 Alpha • Suite 1400 • Farmers Branch, Texas 75244

CENTRE DEVELOPMENT CO., INC.

ROBERT L. TRIMBLE
Executive Vice President
& General Counsel

September 17, 1984

The Honorable Phil Gramm
P. O. Box 10108
Dallas, Texas 75207-9990

Dear Congressman Gramm:

Please find enclosed herewith my check in the amount of $2,000 payable to "Friends of Phil Gramm". This contribution is from myself and my wife, Mary M. Trimble.

We extend to you the very best wishes for a successful campaign.

Sincerely,

ROBERT L. TRIMBLE

RLT:bb:A71
enclosure

8207450007

Mailing address P O Box 802087 • Dallas Texas 75380-2087 • 4000 McEwen • Farmers Branch Texas • (214) 980-8060

ROBERT L. TRIMBLE
P. O. BOX 802087 980-8060
DALLAS, TEXAS 75380-2087

230

9/17 1984

Pay to the order of Friends of Phil Gramm ---------- $ 2,000.00

Two Thousand and No/100 ---------- Dollars

CENTRE NATIONAL BANK
4100 ALPHA ROAD
FARMERS BRANCH, TEXAS 75234
(214) 392-7400

For Political Contribution

⑆111913976⑆ 2001006⑈0230 ⑈0000200000⑈

Rocky Mountain Bank Note 8

PAY TO THE ORDER OF
TRINITY SAVINGS
DALLAS, TEXAS
FOR DEPOSIT ONLY
FRIENDS OF PHIL GRAMM
A NON-PROFIT WASHINGTON D.C. CORP.
GENERAL ELECTION
800 00 5109 2-7
32-7130
DALLAS
TEXAS
PAY ANY BANK, P.E.G.

19 SEP 84

8 9 0 4 0 7 4 5 0 0 8

RECEIVED AT THE FEC
GC#5845
84 DEC 3 A9:00

IN THE
FEDERAL ELECTION COMMISSION

DONNA MOBLEY,

Complainant,

vs.

FRIENDS OF PHIL GRAMM, et al.,

Respondents.

MUR 1837
RESPONSE ON BEHALF OF
INDIVIDUAL RESPONDENTS

This Response is made on behalf of many of the unnamed individual respondents whose names were listed in Exhibit 4 of complainant's Complaint (a listing of such individual respondents is attached hereto). This response is general as to all individual respondents and specific responses, where appropriate, are contained in Section II.

SECTION I

I. Answering paragraph I: Neither admit nor deny the allegations.

II. Answering paragraph II: Have no information concerning said allegations.

III. Answering paragraph III: Have no information concerning said allegations except that respondents admit making contributions to the Friends of Phil Gramm. (Note: Where additional separate answers to these allegations are needed, they will be contained in Section II.)

IV. Answering paragraph IV: Respondents each indicate they were informed and believed the fact to be that Friends of Phil Gramm had debts remaining from the primary

8904074309

election and that it was permissible to contribute toward such debt retirement in addition to contributing to the general election. (Specific separate answers to these allegations are contained in Section II).

V. Answering paragraph V: Respondents have no information on which to base a reply.

VI. Answering paragraph VI: Respondents do not believe the complaint allegations contained in paragraph VI apply to them, but to the extent that there is any implication of violation, respondents deny any willful or intentional violation and say, on the contrary, that they were informed and believed, and continue to believe, that all such contributions were legal, proper and in accordance with the law and regulations.

VII. Answering paragraph VII: Respondents have no information on which to reply to this allegation.

VIII. Answering paragraph VIII: Respondents have no information on which to reply to this allegation.

IX. Answering paragraph IX: Respondents have no information on which to reply to this allegation.

X. Answering paragraph X: Respondents have no information on which to reply to this allegation.

XI. Answering paragraph XI: Respondents have no information on which to reply to this allegation.

In further answer to the Complaint, respondents say that they have been informed and believe that when and if the principal respondent Friends of Phil Gramm had completely funded the indebtednesses from the primary election, that contributions

9904074501 0

in excess thereof would be refunded in accordance with usual and normal practices.

SECTION II

These answers deal with specific contributors and fact situations different from the above general allegations. Affidavits of the facts alleged will be furnished if necessary. Exhibit designations will correspond to paragraph designations.

A. The contribution designated "Mr. B. S. Baker" is in error. The contribution is a single contribution of $1,000 made by Mrs. B. S. Baker. No other contribution was made. A copy of that check is attached as Exhibit A.

B. The two contributions shown for Douglas Conlee are in error since he contributed only once in this election as is evidenced by the attached Exhibits B-1 and B-2. The possible explanation of the error is contained in Exhibit B-1.

C. The contributions from William H. Crain fail to show the Friends of Phil Gramm refunded $500 excess contribution which was made by the contributor in error.

D. The contributions of Gilbert M. Denman, Jr. have been answered by a direct communication from Mr. Denman.

E. The contribution of Mrs. F. Andrew Fasken of Paris, Texas was misreported. Her only contribution was one check for $1,700 which was clearly marked "$700 Primary, $1,000 General" dated 10-4-84. See Exhibit E-1 and E-2 attached.

F. The contribution designated from Earnest Fay has been answered in a direct communication under oath, dated November 15, 1984 from Mr. Fay.

8004074501 1

G. The contributions from Robert and Margaret Folsom were misreported. By check #6685, Mr and Mrs. Folsom each contributed $1,000 to the general election. The only other contribution, $100, was made in February, 1983, which would be a primary contribution. See Exhibit G attached.

H. The contributions of R. L. Foree and Della Foree were designated as one-half to each. They contributed $750 each toward the primary and $1,000 each toward the general.

I. The contribution of Peter Gill should be listed as one-half from his wife and one-half from Mr. Gill.

J. The contribution made by Thomas E. Hartin was misreported from the joint fundraiser held in Dallas, and will be corrected.

K. The contribution of Mrs. Joan Kunitz was misreported as is evidenced in the submission under oath made to the Commission on November 13, 1984. Only one contribution of $1,000 was made in this election cycle.

L. The contribution of Lester L. Logue was misreported from the joint fundraiser held in Dallas and will be corrected. See Exhibit L attached.

M. The contributions of William H. Martin and Karen V. Martin were misreported. Mr. Martin made his first $1,000 contribution 12/7/83, before the primary date, and his second $1,000 contribution on 7/23/84 was made for the general. Mrs. Martin made her $2,000 contribution on 7/23/84 with the designation of $1,000 for the primary and $1,000 for the general. See Exhibits M-1 and M-2.

8904074501 2

N. The contribution of A. Patrick Mc.Evoy was misreported arising out of the joint fundraiser in Dallas, Texas. This will be corrected.

O. The contributions of Mrs. Wade Nowlin were clearly marked for the primary debt reduction. See Exhibit O attached.

P. The contribution of Mrs. Peter O'Donnell, Jr. was made based upon the attached letter (Exhibit P).

Q. The contributions of Clifton Overcash were made from joint funds and were to have been attributed one-half to each. The Gramm campaign returned a $1,000 contribution on 10/12/84.

R. The contributions attributed to Daniel T. Parker are misreported. He made contributions of $10 in April and $15 in September of 1984. Daniel R. Parker (father of Daniel T. Parker) made several $100 contributions, the total of which is not believed to be $500. It is believed that William R. Parker (cousin of Daniel R. Parker) made a contribution of $1,000 in September, 1984. Confusion over the similarity of names should be corrected.

S. The contributions of H. G. Schiff were for the primary and general election and for Mr. and Mrs. H. G. Schiff. These contributions were for $1,000 to each.

T. The contributions of John H. White and his wife were explained in a letter to this commission dated November 9, 1984.

U. The contribution of Robert E. Windom and wife involved the joint fundraiser in Dallas and will be corrected.

8204074501 3

V. The $2,000 of H. B. Zachry, Jr. was made one-half to be attributed to his wife, Mollie Zachry, and one-half to H. B. Zachry and was so designated at the time of giving.

Other individual respondents are being checked to determine if there are additional facts that should be disclosed, and, if other relevant matters are found they will be promptly communicated to the Commission.

WHEREFORE, individual respondents pray that the Complaint as to them may be dismissed forthwith since they should not have been joined in the first instance, and if there was no primary debt the principal campaign committee will refund any surplus.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.
Counsel for Respondents

8904074501 4

MUR 1837 INDIVIDUAL RESPONDENT LIST
(From Plaintiff's Exhibit 4)

Mrs. Ebby Halliday Acers
Mrs. Helen Allen
Dr. William L. Anderson
Mr. James W. Arnold
Mr. Alvis Arthur
Mr. Roland Arthur
Mr. B. S. Baxer
Mrs. Helen Bankston
Dr. Richard A. Box
Mr. Othal E. Brand
M/M L. D. Brinkman
Mr. Hogan T. Brooks
Mr. Bruce G. Brookshire
Mr. Sam Buchanan
M/M Gene Canavan
Mr. Donald M. Carlton
Mr. Frank Cass
Mrs. Mary Cass
Mr. Michael L. Cass
Mr. William G. Cass
Mr. Douglas M. Conlee
Mr. James Lewis Connor III
Mrs. Michelle K. Connor
Mr. Harold D. Courson
Dr. William H. Crain
Mr. Dave Crowley
Mr. Joel Daniel
Mr. Gilbert M. Denman, Jr.
Mr. John Dixon
Mr. Richard E. Doornbos
Mrs. Sally Emde
Dr. William O. Emde
Mr. Wilton H. Fair
Mrs. Andrew Fasken
Mr. Ernest Fay
Mrs. Margaret Folson
Mr. Robert S. Folsom
M/M R. L. Foree, Sr.
Mr. P. Gill
Mr. Thomas E. Hartin
Mr. George S. Hawn
Mr. Frank P. Horlock, Jr.
Mrs. Edith Huebner
Mr. Harvey Huie
Mrs. H. L. Hunt
Mrs. Nancy A. Hunt
Mr. Ray L. Hunt
Mr. J. I. Jackson

9904074501 5

Mr. Thomas T. Keeler
Mr. Joe B. Kercheville
Mr. Louis W. Kreditor
Mrs. Joan Kunitz
Mr. William David Lacy
Mrs. Beth Logue
Mr. Lester Logue
Lt. Gen. Sam Maddux, Jr.
Mrs. Karen Martin
Mr. William H. Martin
M/M Frank W. Mayborn
Ms. Catharine W. McAnally
Mr. A. P. McEvoy
Mrs. Drayton McLane, Jr.
Mr. L. A. McNeil
Mrs. Bettye Nowlin
Mrs. Carl E. Oates
Mrs. Edith Jones O'Donnell
Mr. C. O. Overcash
Mr. Daniel T. Parker
Ms. Laurie Ramsey
Mr. Edward Rea
Mrs. Elga Rea
Mr. T. L. Roach, Jr.
Mr. G. E. Roney
Mr. Frank Scanio, Jr.
Mr. Herbert Schiff
Mrs. Pat Schiff
Mr. R. J. Schumacher
Mr. Marvin Selig
Mr. S. S. Seltzer, Jr.
Mr. Richard T. Sink
Mrs. Merle P. Stieler
Mr. David R. Tacke
Mrs. David R. Tacke
Mr. Wayne E. Thomas
Mrs. Chester R. Upham, Jr.
Mr. Robert L. Wheelock, Jr.
Mr. John H. White
Mrs. Lellia Windom
Dr. Robert E. Windom
Mrs. H. B. (Mollie) Zachry, Jr.

9904074501 6

EXHIBIT A

MR. OR MRS. B. S. BAKER
8638 LAFONTE 681-2874
HOUSTON, TEXAS 77024

1100

October 4 19 84

35-60
1130

PAY TO THE ORDER OF FRIENDS OF PHIL GRAMM $ 2,000.00

TWO THOUSAND AND NO/100---------- DOLLARS

Texas Commerce Bank National Association
P.O. BOX 2558
HOUSTON, TEXAS 77252

FOR 1/2 for Primary; 1/2 for General

Mrs. B. S. Baker

⑈001100⑈ ⑆113000609⑆ 212 664 7⑈ ⑈0000200000⑈

8904074501 7

Exhibit B-1

CONLEE SEED CO., INC.

November 19, 1984

Mr. James F. Schoener, Esq.
Miller, Canfield, Paddock and Stone
1015 15th Street NW, Suite 1200
Washington, DC 20005

Dear Mr. Schoener,

I enclose my statement of designation of Counsel and accept your offer to represent me under this claim.

Their records indicate that I have made two contributions, one for $100.00 and one for $1,000.00. I have gone back through August of 1983 in my records and find that on 10-2-84 I contributed $1,000.00 to the friends of Phil Gramm campaign. I can find no record of contributing the $100.00 they show within this period.

The $1,000.00 contribution was for 10 tickets to his fund raising here at the Waco Convention Center. I carried my two married daughters and their husbands and two other couples with us to the fund raiser.

I have two brothers that I am sure contributed from the Bryan, Texas area, and I am wondering if possibly their contributions might be mixed up with mine and possibly the answer to the $100.00 contribution that I cannot find. I received the complaint November 15, 1984. Should you need any additional information from me, please advise.

I appreciate your representation in the matter.

Yours very truly,

Douglas Conlee

Doug Conlee

Enclosure

DC/hb

P.O. BOX 7247 • WACO, TEXAS 76714-7247 • 817-772-5680

8904075018

Exhibit B-2

CTAD

510

DOUGLAS M. CONLEE
OIL ACCOUNT
BOX 7247
WACO, TX 76710

48-10
1119

10/2/84 19

PAY TO THE ORDER OF Friends of Phil Gramm $ 1000

One Thousand Dollars & Two DOLLARS

The First National Bank of Waco
BOX 950
WACO, TEXAS 76703

FOR

Douglas Conlee

⑈000510⑈ ⑆111900109⑆ 138 672 1⑈ ⑈0000100000⑈

8904075019

Exhibit E-1

G.R. Fasken

Enclosed is a copy of my contribution to Phil Graham. This is the only one I made. I also stated amounts for each race.

Exhibit E-2

8904070021

INTERFIRST

MRS. F. ANDREW FASKEN
LIC. 4453759
3140 CLARK LANE PH. 785-3778
PARIS, TEXAS 75460

3281

10-4 1984

88-178/1119

PAY TO THE ORDER OF Phil Gramm $ 1700 00

Seventeen Hundred & no/100 DOLLARS

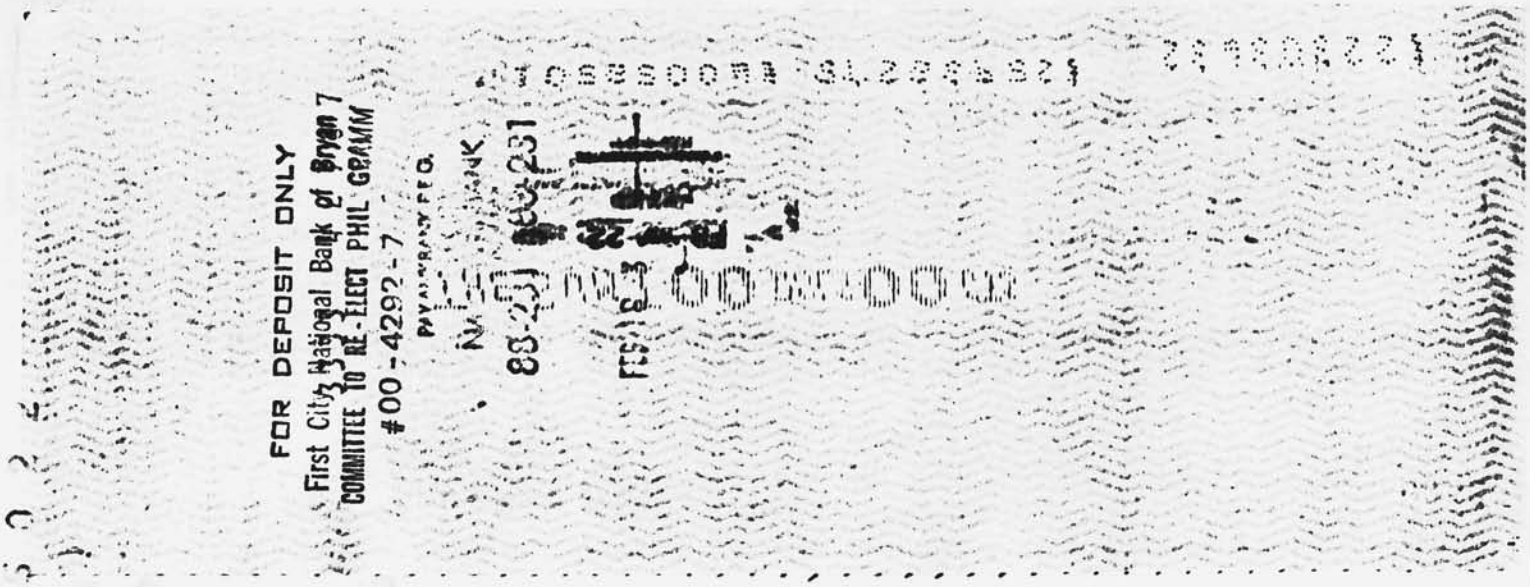
InterFirst
InterFirst Bank Paris
P.O. Box 667, Paris, Texas 75460

MEMO 700 Primary 1000 General

Mrs Andrew Fasken

⑆111900784⑆ 3004 6⑈ 3281 ⑈0000170000⑈

Exhibit G.



FOR DEPOSIT ONLY
First City National Bank of Bryan 7
COMMITTEE TO RE-ELECT PHIL GRAMM
#00-4292-7
PAY ALL BANK REG.
88-231 [illegible]
FEB 16 [illegible]

8 9 0 4 0 [illegible] 5 0 2 4

ROBERT S. FOLSOM
16475 DALLAS PARKWAY, SUITE 800
DALLAS, TEXAS 75248

MercantileBank
Mercantile National Bank at Dallas
PO Box 225415 Dallas, Texas 75265

6353

February 9 1983

PAY TO THE ORDER OF Committee To Re-elect Phil Gramm $100.00

THE SUM 100 DOLS 00 CTS DOLLARS

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

		Contribution		

ROBERT S. FOLSOM

Marie Garrison

⑈00006353⑈ ⑆111000614⑆ 307839123⑈ ⑈0000010000⑈

CLARKE CHECKS - K

Exhibit L

L. L. LOGUE, SPECIAL
1300 ONE ENERGY SQUARE
DALLAS, TEXAS 75206

RepublicBank Dallas, N.A.
P.O. Box 225961 Dallas, Texas 75265

15351

Dallas, Texas August 13 19 84

Pay to the Order of PRESIDENTIAL NOMINATION BREAKFAST BALL---------- $**3,000.00**

REGISTERED R 0-2405 3000dls00cts Dollars

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

	Two tickets		

L. L. LOGUE, SPECIAL

L. L. Logue

⑈015351⑈ ⑆111000627⑆ ⑈022 007 8⑈

Presidential Nomination Breakfast Ball

2451 Stemmons Freeway, Dallas, Texas 75207

_____ YES! I would like to join you at the Presidential Nomination Breakfast Ball in a Special Salute to Jimmy Stewart and Helen Hayes at the Hyatt Regency in Dallas on Thursday, August 23rd.

Tickets are $1500 per person. Please make checks payable to **Presidential Nomination Breakfast Ball.**

Yes I would like to reserve 2 tickets and have enclosed $3,000.00

_____ I would like to reserve _____ tickets and will forward payment later.

_____ I am interested in serving as a co-chairman and selling 8 tickets. Please call about arranging for a political guest or celebrity to be seated at my table.

_____ I am sorry that I cannot be in attendance at this event but have enclosed $_____ as a donation.

Name LESTER L. LOGUE
Address 1300 One Energy Sq.
City/State/Zip Dallas, Tx. 75206
Social Security # 194-09-9781
Date of Birth 4/19/13

Employer/Occupation _____
Business Phone _____
Home Phone _____
Signature L L Logue

(above needed for security clearance)

Paid for by National Republican Senatorial Committee. Authorized by Phil Gramm for Friends of Phil Gramm, the only committee authorized to raise funds to elect Phil Gramm to U.S. Senate. Proceeds from this event to be split between the participating committees: 2/3 Friends of Phil Gramm, 1/6 Texas Victory Committee, 1/6 Republican Host Committee

Exhibit M-1

9069

WILLIAM H. MARTIN
1804 FIRST NATIONAL BANK BLDG. 682-5216
MIDLAND, TEXAS 79701

88-388/1163

7/23 1984

PAY TO THE ORDER OF Friends of Phil Gramm $ 1,000 00/xx

One Thousand & 00/100 DOLLARS

WILLIAM H. MARTIN

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

⑈009069⑈ ⑆116303882⑆ 205 414 0⑈ ⑈0000100000⑈

RepublicBank First National Midland
P.O. BOX 1559 • MIDLAND, TEXAS 79702

AG '84 01
REFNM
MIDLAND, TX
AY ANY BANK

2223 0552

PAY TO THE ORDER OF
FRIENDS OF PHIL GRAMM
FRIENDS OF PHIL GRAMM
WASHINGTON D.C. CORP.
NON-PROFIT ELECTION
FEDERAL ELECTION
800 [illegible]

32-7130
PAY TO THE ORDER OF
FIRST NATIONAL BANK
SAVINGS
DOLLARS
FOR DEPOSIT ONLY
TO THE ACCT OF
PHIL GRAMM

JUL 84

020312623

WILLIAM H. MARTIN
1804 FIRST NATIONAL BANK BLDG. 682-5216
MIDLAND, TEXAS 79701

57634

88

88-388/1163

12/7 1983

PAY TO THE ORDER OF Friends of Phil Gramm $ 1,000 00/xx

One Thousand & 00/100 DOLLARS

WILLIAM H. MARTIN

THIS CHECK IS DELIVERED FOR PAYMENT ON THE FOLLOWING ACCOUNTS

⑈008827⑈ ⑆116303882⑆ 205 414 0⑈ ⑈0000100000⑈

THE FIRST NATIONAL BANK OF MIDLAND
MIDLAND, TEXAS 79702

DE '83 13
ANY BANK BANKER
TRUST CO. P.L.C.
FIRST CITY BANK OF DALLAS
DALLAS TEXAS

Pay to the Order of
rst City National Bank
of Bryan, Texas
riends of Phil Gramm
#00-4292-7-01

Exhibit M-2

38326-5 7009

THE FIRST NATIONAL BANK OF MIDLAND
MIDLAND, TEXAS 79701

MRS. WILLIAM H. MARTIN
1404 COUNTRY CLUB DR. 682-8122
MIDLAND, TEXAS 79701

88-388/1163

7/23 1984

PAY TO THE ORDER OF Friends of Phil Gramm $2,000 00/xx

Two Thousand & no/100 DOLLARS

THIS CHECK IS DELIVERED FOR PAYMENT ON THE FOLLOWING ACCOUNTS

MRS. WILLIAM H. MARTIN

Karen V. Martin

⑈007009⑈ ⑆116303882⑆ 205 415 9⑈ ⑈0000200000⑈

SELECT CHECK PRINTERS TO

---

8 9 0 4 0 7 5

Pay to the Order of
First City National Bank
of Bryan, Texas
Friends of Phil Gramm
#00-4292-7-01

AG '84 10

AG '84 10

Exhibit O

1159

MRS. WADE NOWLIN
510 HAZELWOOD PH. 732-2228
FORT WORTH, TEXAS 76107

8/23 19 87

37-7388
3119

PAY TO THE ORDER OF Presidential Nomination Buffet $ 1,000 00

One Thousand and no/100 DOLLARS

NOWLIN SAVINGS
HOME OFFICE: Fort Worth, Texas

FOR Phil Gramm Mrs Wade Nowlin

⑆311973884⑆057151228409⑈ 1159 ⑈0000100000⑈

1144

MRS. WADE NOWLIN
510 HAZELWOOD PH. 732-2228
FORT WORTH, TEXAS 76107

8/14 19 87

37-7388
3119

PAY TO THE ORDER OF Phil Gramm for Senate $ 1,000.00

One Thousand and no/100 DOLLARS

NOWLIN SAVINGS
HOME OFFICE: Fort Worth, Texas

FOR primary debt retention Mrs Wade Nowlin

⑆311973884⑆057151228409⑈ 1144 ⑈0000100000⑈

8900407 50026

Exhibit P

October 2, 1984

Mr. James B. Francis, Jr.
Bright & Company
2355 Stemmons Freeway
Dallas, Texas 75207

Dear Jim:

I am enclosing Edith's check in the amount of $1,000.00, payable to the Phil Gramm Senate Campaign, to be used to pay for primary campaign expenses.

It is my understanding that Edith can designate this to pay for expenses of his primary campaign and that she will not exceed her federal limit even though she contributed $1,000.00 to Gramm's general election campaign on June 1, 1984.

If my understanding is not correct, please do not deposit this check but return it to me.

Sincerely yours,

Peter O'Donnell, Jr.

PODjr:mj

Encl.

8907050027

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 3, 1984

Robert R. Lowdon
2727 West Seventh Street
Fort Worth, Texas 76107

Re: MUR 1837

Dear Mr. Lowdon:

This is in response to your letter requesting additional time to respond in the above-captioned matter. After considering the reasons cited in your request this Office has determined to grant you an extension until December 10, 1984.

If you have any questions, please call Patty Reilly the staff member assigned to this matter at 202-523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074502 8

RECEIVED AT THE FEC
GCC#5900
84 DEC 7 P12:46

LAW OFFICES OF
LAW, SNAKARD & GAMBILL
A PROFESSIONAL CORPORATION
3200 TEXAS AMERICAN BANK BUILDING
FORT WORTH, TEXAS 76102

AREA 817 335-7373
METRO 429-2991
TELECOPY 332-7473

THOS. H. LAW
LAWTON G. GAMBILL
ROBERT M. RANDOLPH
RICE M. TILLEY, JR.
SAMUEL A. DENNY
WALTER S. FORTNEY
ROBERT F. WATSON
KENT D. KIBBIE
DENNIS R. SWIFT
MARVIN CHAMPLIN
JAY S. GARRETT
WILLIAM D. GREENHILL
G. THOMAS BOSWELL
JAMES W. SCHELL
WILLIAM F. McCANN
MICHAEL L. MALONE
ALAN WILSON
WALKER FRIEDMAN
ROBERT W. BLAIR
MARK L. GIBBONS
MICHAEL J. SHEARN
ED HUDDLESTON
JONATHAN G. KERR
VERNON E. REW, JR.
A. BURCH WALDRON, III

JOHN M. MENEY
H. ALLEN PENNINGTON, JR.
TIMOTHY M. HAYES
G. PARKER YOUNG
STEVEN D. GOLDSTON
PAMELA ARNOLD OWEN
LINDA GOEHMAN SMITH
CAROL WARE DAVIDSON
CHESTER W. GRUDZINSKI, JR.
ROBERT C. HANNAN
DABNEY D. BASSEL
GARY L. STEEL
ELIZABETH S. HOLLAND

OF COUNSEL
RICE M. TILLEY
ROBERT F. SNAKARD

December 3, 1984

84 DEC 7 P2:21
FEDERAL ELECTION COMMISSION

Mr. Kenneth A. Gross
Assistant General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 1837

Dear Mr. Gross:

I am writing you in my capacity as designated counsel for Mr. R. R. Lowdon. A Statement of Designation of Counsel designating me as such and signed by Mr. Lowdon is being forwarded to you with this letter.

Mr. Lowdon's records show that he and his wife made the following contributions:

Date	Amount	Recipient
7/6/84	$ 1,000	Friends of Phil Gramm
8/14/84	500	Friendds of Phil Gramm
9/28/84	1,000	Gramm Fort Worth Breakfast

Mr. Lowdon was advised during the fall of this year (and I have again confirmed this on this date with Senator Gramm's campaign headquarters) that the Gramm campaign did have a net indebtedness as of the end of the primary campaign. As a result, Mr. Lowdon and his wife were authorized by law to contribute a total of $4,000 to Mr. Gramm's campaign. Since they have contributed only a total of $2,500, their contributions are not in violation of applicable federal law.

If you need any additional information from me, please so advise.

Very truly yours,

Rice M. Tilley, Jr.

RMTjr:ac
Encl.

2 9 0 4 0 7 4 5 0 2 9

cc: Mr. R. R. Lowdon
2727 W. 7th Street
Fort Worth, Texas 76107

8304070450330

GCC#5878

ANDREWS & KURTH
ATTORNEYS
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 861-7400
TELEX: 79-1208
TELECOPIER (202) 861-7437

TEXAS COMMERCE TOWER
HOUSTON, TEXAS 77002
(713) 220-4200

4400 THANKSGIVING TOWER
DALLAS, TEXAS 75201
(214) 979-4400

December 7, 1984

DEC 7 AM 11:40

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
Franklin Square North
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1837

Dear Mr. Steele:

On November 8, 1984, Robert L. Bradley received a letter from you informing him that the Federal Election Commission (the "Commission") had received a complaint filed by Ms. Donna Mobley alleging that Mr. Bradley had violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). Pursuant to an extension granted by the Office of General Counsel, the date for Mr. Bradley's reply was extended to December 7, 1984. I am filing this letter and the attached affidavits as designated counsel for Mr. Bradley to set forth the following reasons why the Commission should take no action with respect to Mr. Bradley in response to the complaint.

COMPLAINT

At the outset, I note that the complaint filed by Ms. Mobley does not name Mr. Bradley as a respondent thereto. The complaint does indicate a possible basis of a violation by Mr. Bradley in that reports filed with the Commission by "Friends of Phil Gramm" reported that Mr. Bradley had made two $1,000 contributions to the Gramm U.S. Senate campaign. As will be seen from the facts presented below, however, this is not the case, and, therefore, there exists no basis for the Commission to take any action with respect to Mr. Bradley.

FACTS

"Friends of Phil Gramm" has apparently reported two separate $1,000 contributions from Mr. Bradley. As set forth in the attached affidavits executed by

Mr. Bradley, his wife, Margaret Lockett Bradley, W.J. Bowen, and Barbara A Kelley, there have been two $1,000 contributions to "Friends of Phil Gramm" from Mr. and Mrs. Bradley, one dated June 14, 1984 and the other dated July 17, 1984, both from their joint bank account. However, the June 14, 1984 contribution was from Mr. Bradley and the July 17, 1984 contribution was from Mrs. Bradley.

Mr. Bradley is an attorney in Houston, Texas and a partner in this firm. On July 17, 1984, Mr. Bradley was solicited for a contribution to "Friends of Phil Gramm" by W.J. Bowen, a close personal friend of Mr. Bradley and Chairman of the Board and Chief Executive Officer of Transco Energy Company. Mr. Bradley told Mr. Bowen that he would send a check, but noted that he might have already made a contribution to "Friends of Phil Gramm." Mr. Bowen said that he would like to have the check as soon as possible, and Mr. Bradley agreed to send the check right away. Mr. Bradley then sent Mr. Bowen a check for $1,000 payable to "Friends of Phil Gramm" drawn on the joint bank account maintained by Mr. and Mrs. Bradley at the Texas American Bank/Houston.

At this time, Mr. Bradley knew that the maximum contribution he could make to "Friends of Phil Gramm" was $1,000 and that if he had made an earlier contribution, the additional contribution would be improper in the amount that it caused Mr. Bradley to exceed the contribution limitation of the Act. Mr. Bradley knew that if he had made an earlier contribution, he might have to make an adjustment or make no contribution at all. However, at the time Mr. Bradley mailed his check to Mr. Bowen, he did not view this matter as particularly troublesome, because Mr. Bradley knew that he could call Mr. Bowen, who would either return the July 17, 1984 check or take some other step to ensure that no improper contribution was made by Mr. Bradley.

After mailing the check to Mr. Bowen, Mr. Bradley checked his records and discovered that on June 14, 1984, he had contributed $1,000 to "Friends of Phil Gramm." Mr. Bradley then asked Margaret Lockett Bradley if she would make a $1,000 contribution to "Friends of Phil Gramm," and Mrs. Bradley replied that she would be glad to do so.

Mr. Bradley telephoned Mr. Bowen and requested that Mrs. Bradley be designated as the contributor of the July 17, 1984 check that was drawn on Mr. and Mrs. Bradley's joint bank account. Mr. Bowen replied that he would do so, but advised Mr. Bradley also to tell Mr. Bowen's administrative assistant, Barbara A. Kelley, so she could remind Mr. Bowen of the conversation. Mr. Bradley then telephoned Ms. Kelley and informed her that the July 17, 1984 check was to be reported as a contribution by Mrs. Bradley. Mr. Bowen told the person who actually completed the reports required by the Commission to report the July 17, 1984 check drawn on the joint bank account of Mr. and Mrs. Bradley as the contribution of Margaret Lockett Bradley.

Ms. Kelley was present when Mr. Bowen told the persons completing the reports that the July 17, 1984 check was a contribution by Mrs. Bradley, and in

8904074503 2

addition Ms. Kelley wrote the following instructions to the persons completing the reports on a copy of the transmittal letter which accompanied the check sent by Mr. Bradley:

> David/Ross: check from Bob Bradley needs to be from Margaret (written on joint account) Bradley because he is up to the limit on Gramm. Thanks, Barb.

(See Attachment to Ms. Kelley's affidavit.) Several days later, Mr. Bradley called Ms. Kelley to make sure that the July 17, 1984 check had been reported as a contribution by Mrs. Bradley, and she advised him that it would be reported as Mrs. Bradley's contribution.

Apparently, the person who completed the report to the Commission failed or neglected to follow Mr. Bowen's and Ms. Kelley's instructions regarding the July 17, 1984 check drawn on Mr. and Mrs. Bradley's joint bank account, and the contribution made via this check was erroneously reported as a contribution by Mr. Bradley.

3 0 4 0 7 4 5 0 3 3

LAW

The Commission's regulations and advisory opinions make it clear that under the Act a husband and wife are treated as individuals and that each spouse may contribute up to the contribution limitations set forth in 2 U.S.C. § 441a(a)(1) and 11 C.F.R. § 110.1(a). See AO 1975-31, 1 Fed. Election Camp. Fin. Guide (CCH) ¶5145. Under the regulations, each spouse may make a contribution up to the limitation set for an individual even in the case of a single income family. 11 C.F.R. § 110.1(i)(1).

In AO 1980-11, 1 Fed. Election Camp. Fin. Guide (CCH) ¶5468, the Commission allowed a wife who had neither a joint checking account nor any other checking account to make a contribution using a check drawn on her husbands's checking account and signed by the husband. The Commission stated:

> [Y]ou ask whether a person who has neither their own checking account nor a joint checking account, may make a contribution to your 1978 campaign by using a check drawn on the account of a spouse who has already reached his/her $1,000 contribution limit to your campaign.
>
> Section 110.1(i)(1) of Commission regulations states that "even though a spouse in a single income family has contributed $1,000 to a candidate for an election, the other spouse may similarly contribute $1,000 to the same candidate for the same election." That regulation cites to § 104.5(e) of the regulations which provides that "a contribution which represents contribu-

> tions by more than one person shall indicate on the written instrument or on an accompanying writing signed by all contributors, the amount to be attributed to each contributor."
>
> These regulations indicate that a contribution by both spouses could be made through one check for an amount up to $2,000 (per candidate, per election) as long as the attribution is indicated and the check or accompanying document is signed by both the husband and wife. Since both the husband and wife may contribute on one check, the Commission concludes that it would be permissible for a spouse in the situation you present, that is, a spouse who has neither a joint checking account nor any other checking account, to contribute through the checking account of the other spouse provided the check or an accompanying writing states whose contribution the check represents and is signed by the intended contributor.

Id. at p. 10,525. Certainly if a spouse may make a contribution by using a check signed by the other spouse from an account solely in the name of the other spouse (i.e., not a joint account), a spouse may make a contribution by check drawn on a joint account in the name of both spouses. Therefore, there is no question that under the Act and the Commission's regulations, Margaret Lockett Bradley could make a contribution to "Friends of Phil Gramm" by check drawn on the joint bank account in the names of Mr. and Mrs. Bradley.

The Commission's regulations state that a contribution made by check is attributable to the last person signing the check, unless there is evidence to the contrary. 11 C.F.R. § 104.8(c). The preceding facts, documented by the affidavits of Mr. Bradley, Mrs. Bradley, Mr. Bowen, and Ms. Kelley, establish that the July 17, 1984 check endorsed by Mr. Bradley was a contribution by Mrs. Bradley and that it was understood to be so by Mr. and Mrs. Bradley, Mr. Bowen, and Ms. Kelley. Because of a clerical error, the contribution was erroneously reported as being from Mr. Bradley.

I trust that this letter will put to rest any questions concerning Mr. Bradley that were raised by Ms. Mobley's complaint. Needless to say, if you or your staff wish any further information or documentation on this matter, please let me know.

Very truly yours,

Michael F. Butler

MFB/crw
Attachments

8 9 0 4 0 7 4 5 0 3 4

ATTACHMENT I

AFFIDAVIT

My name is Robert L. Bradley. I reside at 2200 Willowick #14C, Houston, Texas 77027. I am a lawyer and a partner in the firm of Andrews & Kurth in Houston, Texas. On July 17, 1984 Mr. W. J. Bowen, Chairman of the Board and Chief Executive Officer of Transco Energy Company in Houston, Texas, called me on the telephone. Jack Bowen is a close personal friend and a long standing client. He said that he was collecting contributions to the "Friends of Phil Gramm" for the Phil Gramm Senatorial Campaign. He requested a contribution from me. I told him that I would send a check, but that I may have already made a contribution to "Friends of Phil Gramm" some months or weeks before. He said that he wanted the check as soon as possible and I told him that I would send it right away. I sent him a check in the amount of $1,000.00 drawn on the joint account of me and my wife, Margaret Lockett Bradley (account no. 100 149 in the Texas American Bank/Houston). At that time, I knew that the maximum contribution I could make to the Gramm campaign was $1,000 and that if I had made an earlier contribution, the additional contribution would be improper and I would have to make an adjustment, either by making a smaller contribution or by making no contribution at all. This was no problem, because Jack Bowen is an old friend and I knew I could call him and either have the check returned or whatever other steps taken so that no improper contribution would be made. After having mailed the check, I looked at my records and found that I had contributed $1,000.00 to "Friends of Phil Gramm" from the same joint checking account on June 14, 1984. Xerox copies of the two checks are attached hereto and made a part hereof as "Exhibit A".

Having ascertained this, I talked to my wife, Margaret Lockett Bradley, about making the second contribution. She said that she would be delighted to do so. I telephoned Jack Bowen and told him that I had contributed the maximum amount to the Gramm Senatorial Campaign in June but that my wife, Margaret Lockett Bradley, wanted to contribute the $1,000.00 represented by the check dated July 17, 1984 and

8904074503 3

drawn on our joint account. He said that he would report this second contribution as the contribution of Margaret Lockett Bradley. He also advised me to inform his administrative assistant, Barbara A. Kelley, that this contribution was the contribution of Margaret Lockett Bradley. I telephoned Barbara Kelley and informed her of this fact. She said that the contribution would be so reported. About a week later, in order to be sure that the contribution had been correctly reported, I called Ms. Kelley again and reminded her that it was the contribution of my wife. She said that it had been or would be so reported.

Apparently the second contribution was erroneously reported as my contribution in contravention of my explicit instructions and the desires of my wife, Margaret Lockett Bradley. This error in designation of the contributor is the reason that I appear to have donated more than the maximum amount to the Gramm Senatorial Campaign and is the basis of the complaint filed against me.

Robert L. Bradley

Robert L. Bradley

Sworn to and subscribed before me on this 3RD day of December 1984.

L P

Notary Public In and For Harris County, Texas

My Commission Expires: [illegible] PIERCE
[illegible] for the State of Texas
[illegible] Expires January 16, 1985

8904074503 6

EXHIBIT "A"

8904074503 7

ROBERT L. BRADLEY
MARGARET LOCKETT BRADLEY
4200 TEXAS COMMERCE TOWER
HOUSTON, TEXAS 77002

14363

TEXAS AMERICAN BANK
HOUSTON N.A.

July 17, 19 84

35-122
1130

PAY TO THE ORDER OF Friends of Phil Gramm $ 1,000.00

One thousand and No/100 DOLLARS

ROBERT L. BRADLEY
MARGARET LOCKETT BRADLEY

FOR contribution Robert L. Bradley

⑈014363⑈ ⑆113001226⑆ ⑈ 100 149⑈ ⑈0000100000⑈

attorney - Andrews & Kurth

38160-5

14299

ROBERT L. BRADLEY
MARGARET LOCKETT BRADLEY
4200 TEXAS COMMERCE TOWER
HOUSTON, TEXAS 77002

TEXAS AMERICAN BANK
HOUSTON N.A.

FR

June 14, 19 84

35-122
1130

PAY TO THE ORDER OF Friends of Phil Gramm $ 1,000.00

One thousand and No/100 DOLLARS

ROBERT L. BRADLEY
MARGARET LOCKETT BRADLEY

FOR contribution Robert L. Bradley

⑈014299⑈ ⑆113001226⑆ ⑈ 100 149⑈ ⑈0000100000⑈

ATTACHMENT II

AFFIDAVIT

My name is Margaret Lockett Bradley. I reside at 2200 Willowick #14C, Houston, Texas 77027. I am a housewife and the wife of Robert L. Bradley. On or about July 17, 1984, my husband informed me that he had found from his records that he had contributed $1,000.00 to "Friends of Phil Gramm" on the previous June 14 and that he had sent a second check for $1,000.00 payable to "Friends of Phil Gramm" on July 17 to W. J. Bowen. He said that he was prevented by federal law from contributing more than $1,000.00 to the Gramm Senatorial Campaign but that both checks were drawn on our joint account no. 100 149 in Texas American Bank/Houston. He asked me if I wanted to make the second contribution to the Gramm Senatorial Campaign. I told him that I would be glad to do so. He said that he would telephone W. J. Bowen and that the contribution would be reported as my contribution. Later, he told me that he had talked to W. J. Bowen and Barbara Kelley, administrative assistant to W. J. Bowen, and that the contribution would be designated as my contribution to the Gramm Senatorial Campaign.

Margaret Lockett Bradley

Sworn to and subscribed before me on this 3rd day of December 1984.

Notary Public In and For Harris County, Texas

My Commission Expires: [illegible] PIERCE [illegible] State of Texas [illegible] 1985

8 9 0 4 0 7 4 5 0 3 8

ATTACHMENT III

AFFIDAVIT

My name is W. J. Bowen. I reside at 3711 San Felipe #8A, Houston, Texas 77027. I am Chairman of the Board and Chief Executive Officer of Transco Energy Company in Houston, Texas. Last summer I collected contributions to "Friends of Phil Gramm" for forwarding to the Gramm Senatorial Campaign. On July 17, 1984 I telephoned Robert L. Bradley and requested a contribution from him. He sent me a check drawn on the joint account of him and his wife, Margaret Lockett Bradley, payable to "Friends of Phil Gramm" and in the amount of $1,000.00. Shortly thereafter, he telephoned me to tell me that his records showed an earlier contribution in the amount of $1,000.00 to "Friends of Phil Gramm" and that his wife, Margaret Lockett Bradley, was contributing the second $1,000.00. He requested that Margaret Lockett Bradley be designated as contributor of that amount in reporting the contribution. I said that this would be done but advised him to also tell this to my administrative assistant, Barbara A. Kelley, so that I would be sure to remember to do it.

I did remember my conversation with Mr. Bradley and told the person who actually filled out the reports of contributions to show this contribution as that of Margaret Lockett Bradley. Apparently that person failed to do so and the contribution was erroneously reported as that of Robert L. Bradley.

W. J. Bowen

Sworn to and subscribed before me on this 3rd day of December 1984.

Notary Public In and For Harris County, Texas

My Commission Expires: 5-1-85

9904074039

ATTACHMENT IV

AFFIDAVIT

My name is Barbara A. Kelley. I reside at 3900 Woodchase #2, Houston, Texas 77042. I am administrative assistant to W. J. Bowen, Chairman of the Board and Chief Executive Officer of Transco Energy Company in Houston, Texas. On or about July 17, 1984, Mr. Robert L. Bradley telephoned me about a check in the amount of $1,000.00 drawn on the joint account of him and his wife, Margaret Lockett Bradley, and payable to "Friends of Phil Gramm". He said that he had mailed this check to W. J. Bowen. He also said that he had looked at his records and that he had contributed the maximum amount to the Gramm Senatorial Campaign at an earlier date. He said that the check sent to Mr. Bowen was a contribution from his wife, Margaret Lockett Bradley, and should be so reported. Shortly thereafter, I was present when Mr. Bowen told the person who was filling out the reports that the contribution should be shown as that of Margaret Lockett Bradley. At that time, I wrote on a copy of Mr. Bradley's letter transmitting the check the following instructions to the persons filling out the reports to the Federal Election Commission: "David/Ross: check from Bob Bradley needs to be from Margaret (written on joint account) Bradley because he is up to limit on Gramm. Thanks. Barb". A copy of Mr. Bradley's letter with my instructions written thereon is attached to and made a part of this affidavit as "Exhibit A". A few days later, Mr. Bradley called me again to make sure that the contribution had been designated as that of his wife, Margaret Lockett Bradley. I told him that the persons making the contribution reports had been so informed and that Mrs. Bradley's contribution had been or would be so shown.

Barbara A. Kelley

Sworn to and subscribed before me on this 31 day of December 1984.

Notary Public In and For Harris County, Texas

My Commission Expires:

8900074340

EXHIBIT "A"

ANDREWS & KURTH
ATTORNEYS
TEXAS COMMERCE TOWER
HOUSTON, TEXAS 77002
(713) 220-4200
TELECOPIER: (713) 220-4295
TELEX: 79-1208

WASHINGTON, D.C. OFFICE
ANDREWS & KURTH
1747 PENNSYLVANIA AVE., N.W.
WASHINGTON, D.C. 20006
(202) 861-7400

DALLAS OFFICE
ANDREWS, KURTH & RITCHIE
1100 REPUBLICBANK BUILDING
DALLAS, TEXAS 75201
(214) 742-6285

July 17, 1984

David / Pam -
Check from Bob Bradley
needs to be from Margaret
(written on joint account) Bradley
because he is up to limit
on Gramm thanks. Bob

Mr. W. J. Bowen,
Chairman of the Board
and Chief Executive Officer
Transco Energy Company
Post Office Box 1396
Houston, Texas 77251

Dear Jack:

You will find my personal check in the amount of $1,000.00 payable to "Friends of Phil Gramm" enclosed with this letter.

I have talked to Clint Morse and additional contributions from Andrews & Kurth to this group will be forthcoming and will be sent to you. We haven't decided yet whether to make our contribution through the firm PAC or through individual donors, but you should be receiving something before too long.

Very truly yours,

Bob
~~Robert L. Bradley~~

RLB/sap
Enclosure

P.S. Since the above was written, I have received the firm PAC check in the amount of $2,500.00 which I also enclose.

RLB

8 9 0 4 0 7 4 5 0 4 1

RECEIVED AT THE FEC
HAND DELIVERED
84 DEC 7 P1:30
GC#5901

BAKER & HOSTETLER
ATTORNEYS AT LAW
618 CONNECTICUT AVE., N.W.
WASHINGTON, D.C. 20006
(202) 861-1500
TELECOPIER (202) 857-0010

IN CLEVELAND, OHIO
3200 NATIONAL CITY CENTER
CLEVELAND, OHIO 44114
(216) 621-0200
TWX 810 421 8375

IN COLUMBUS, OHIO
65 EAST STATE STREET
COLUMBUS, OHIO 43215
(614) 228-1541

IN DENVER, COLORADO
SUITE 1100, 303 EAST 17TH AVENUE
DENVER, COLORADO 80203
(303) 861-0600

IN ORLANDO, FLORIDA
13TH FLOOR BARNETT PLAZA
ORLANDO, FLORIDA 32801
(305) 841-1111

WRITER'S DIRECT DIAL NO.:
(202) 861- 1531

December 7, 1984

RECEIVED
FEDERAL ELECTION
COMMISSION
GENERAL COUNSEL
84 DEC 7 P2:20

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Matter Under Review 1837

Dear Mr. Steele:

This office represents the National Association of Home Builders BUILD Political Action Committee ("BUILDPAC") in Matter Under Review 1837. Enclosed is BUILDPAC's response to the allegations contained in Ms. Donna Mobley's complaint. This response is due on December 7, 1984 pursuant to an extension of time requested by BUILDPAC and granted by the Federal Election Commission.

Very truly yours,

William H. Schweitzer

William H. Schweitzer

WHS:df
Enclosure

R 9 0 4 0 7 4 3 0 4 2

BEFORE THE FEDERAL ELECTION
COMMISSION OF THE UNITED STATES
OF AMERICA

IN RE PHIL GRAMM, et al.	Matter Under Review 1837

RESPONSE OF NATIONAL ASSOCIATION OF HOME BUILDERS BUILD POLITICAL ACTION COMMITTEE TO ALLEGATIONS CONTAINED IN COMPLAINANT'S COMPLAINT

I. PRELIMINARY STATEMENT

On November 7, 1984, the National Association of Home Builders BUILD Political Action Committee ("BUILDPAC") received a letter dated November 7, 1984 from Charles N. Steele, general counsel of the Federal Election Commission ("FEC"), and a complaint alleging violations of the federal election laws signed by Ms. Donna Mobley ("Mobley"). On November 15, 1984, BUILDPAC requested an extension of time to and including December 7, 1984 to respond to the allegations contained in Mobley's complaint. The FEC granted BUILDPAC's request for an extension of time.

II. FACTS

On May 21, 1984, BUILDPAC made a $5,000 contribution to the Friends of Phil Gramm Committee ("Gramm Committee")

8904074504 3

for the retirement of debts incurred by the Gramm Committee in the primary election campaign for the office of United States Senator from the State of Texas. See Affidavit of Peter Rintye ("Rintye Affidavit") at ¶ 5. The Texas Republican primary election took place on May 5, 1984. Id. ¶ 4. BUILDPAC also made a contribution of $5,000 to the Gramm Committee on October 1, 1984. Id. ¶ 6. Said contribution was for use by the Gramm Committee in the general election campaign for the office of United States Senator from the State of Texas. Id. BUILDPAC made no other contributions to the Gramm Committee. Id. ¶ 7.

Prior to making its primary election contribution to the Gramm Committee, Mr. Peter Rintye, political affairs director of BUILDPAC, was advised by Mr. John Thomas Sheehan, political action committee coordinator for the National Republican Senatorial Committee ("NRSC"), that the Gramm Committee had a primary debt and was in need of contributions in order to retire the debt. Id. ¶ 3; Affidavit of John Thomas Sheehan ("Sheehan Affidavit") ¶ 4.

III. ARGUMENT

The federal election laws prohibit contributions in excess of $5,000 in any election by qualified

9904074504

multi-candidate committees. 2 U.S.C. § 441a(a)(2)(A). BUILDPAC is a qualified multi-candidate committee ("PAC"). Rintye Affidavit ¶ 1. The federal election laws permit a PAC to make contributions to a candidate for federal office subsequent to the date of the election if the candidate still has a debt incurred as a result of expenses made in said election. 11 C.F.R. § 110.1(a)(2). The contribution limitations apply to a post-election contribution.

The Gramm Committee had a post-primary election debt. Sheehan Affidavit ¶ 4. Prior to making its primary election contribution to the Gramm Committee, BUILDPAC ascertained that the Gramm Committee had a primary debt by checking with the NRSC, the campaign committee which oversees the campaigns of Republican candidates for the office of United States Senate. Id.; Rintye Affidavit ¶ 3.

BUILDPAC acted within the contribution limitations mandated by the federal election laws when it made its primary election contribution to the Gramm Committee.

9940745045

IV. CONCLUSION

WHEREFORE, BUILDPAC respectfully requests that the FEC take no action against it and dismiss Mobley's complaint as it applies to BUILDPAC.

Respectfully submitted,

BAKER & HOSTETLER

By: William H. Schweitzer
William H. Schweitzer
Counsel for the National
Association of Home
Builders BUILD Political
Action Committee

8904074504 5

BEFORE THE FEDERAL ELECTION
COMMISSION OF THE UNITED STATES
OF AMERICA

IN RE PHIL GRAMM, et al.	)	Matter Under Review 1837

AFFIDAVIT OF PETER RINTYE

DISTRICT OF COLUMBIA) ss:

PETER RINTYE for his affidavit deposes and says:

1. I am the political affairs director of the National Association of Home Builders BUILD Political Action Committee ("BUILDPAC"), a qualified multi-candidate committee under the federal election laws.

2. My responsibilities as political affairs director of BUILDPAC include gathering information about candidates for the office of United States Senator and United States Representative for the purpose of assisting BUILDPAC's board of trustees and executive committee make decisions concerning the contribution of BUILDPAC's monies.

3. On or about May 14 or 15, 1984, I talked to Mr. John Thomas Sheehan, political action committee coordinator of the National Republican Senatorial Committee,

8904074504 7

for the purpose of ascertaining whether the Friends of Phil Gramm Committee ("Gramm Committee") had a 1984 primary election debt. BUILDPAC's board of trustees had declined to make a contribution to the Gramm Committee prior to the primary election and was considering making a post-primary contribution for the purpose of debt retirement. Mr. Sheehan advised me that the Gramm Committee had a primary campaign debt of over $100,000.

4. The Texas Republican primary election took place on May 5, 1984.

5. On May 21, 1984, BUILDPAC contributed $5,000 to the Gramm Committee for the primary election.

6. On October 1, 1984, BUILDPAC contributed $5,000 to the Gramm Committee for the general election.

7. BUILDPAC made no other contributions to the Gramm Committee.

PETER RINTYE

Subscribed and sworn to before me this 7th day of December, 1984.

Notary Public

My Commission expires:

My Commission Expires June 15, 1988

3 9 0 4 0 7 4 3 0 4 3

BEFORE THE FEDERAL ELECTION
COMMISSION OF THE UNITED STATES
OF AMERICA

IN RE PHIL GRAMM, et al.	)	Matter Under Review 1837

AFFIDAVIT OF JOHN THOMAS SHEEHAN

DISTRICT OF COLUMBIA) ss:

JOHN THOMAS SHEEHAN for his Affidavit deposes and says:

1. I am the political action committee coordinator for the National Republican Senatorial Committee ("NRSC").

2. The NRSC is the Republican Party committee which oversees the campaigns of Republican candidates for the Office of United States Senator.

3. As political action committee coordinator of the NRSC, I act as a liaison between the Senate campaigns and the political action committees.

4. On or about May 14 or 15, 1984, I talked by telephone to Mr. Peter Rintye, political affairs director of the National Association of Home Builders BUILD Political Action Committee. Mr. Rintye asked me if the

8904074504 9

Friends of Phil Gramm Committee ("Gramm Committee") had a primary election debt. Prior to my conversation with Mr. Rintye, I had talked to Bemis Smith, finance director of the Gramm Committee, and he had advised me that the Gramm Committee had a primary election debt of over $100,000. I conveyed this information to Mr. Rintye during our telephone conversation.

JOHN THOMAS SHEEHAN

Subscribed and sworn to before me this 7th day of December, 1984.

Notary Public

NOTARY PUBLIC
DISTRICT OF COLUMBIA

MY COMMISSION EXPIRES JANUARY 31, 1989

8900745050

GCC#5952

HAND DELIVERED

84 DEC 12 P3:30

LAW OFFICES OF

MILLER, CANFIELD, PADDOCK AND STONE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SUITE 1200

1015 FIFTEENTH STREET, N.W.

WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

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JAMES F. SCHOENER *
WILLIAM G. BUTLER
FITCH R. WILLIAMS
MICHAEL J. HODGE
COUNSEL

EMMETT E. EAGAN
CONSULTING PARTNER

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

JOHN A. GILRAY, JR., P.C.
JAMES E. TOBIN
STRATTON S. BROWN
RICHARD B. GUSHÉE, P.C.
PETER P. THURBER
LAWRENCE A. KING, P.C.
ROBERT E. HAMMELL
JOSEPH F. MAYCOCK, JR.
ALLEN SCHWARTZ
JOHN W. GELDER, P.C. *
GEORGE E. PARKER III **
RICHARD A. JONES, P.C.
STEVAN UZELAC, P.C.
GILBERT E. GOVE
WOLFGANG HOPPE
GEORGE F. DECLAIRE *
ROBERT S. KETCHUM, P.C.
SAMUEL J. McKIM III, P.C.
ROCQUE E. LIPFORD, P.C.

JOEL L. PIELL
ROBERT E. GILBERT
MICHAEL P. KNAPP
BRUCE D. BIRGBAUER
DAVID OLMSTEAD
GEORGE T. STEVENSON
JOHN A. THURBER, P.C.
ORIN D. BRUSTAD, P.C.
CARL H. VON ENDE
GORDON A. BECKER
DAVID D. JOSWICK, P.C. *
CHARLES L. BURLEIGH, JR.
JOHN A. MARXER, P.C.
GREGORY L. CURTNER, P.C.
DENNIS R. NEIMAN
KENNETH E. KONOP
LEONARD D. GIVENS
W. MACK FAISON
THOMAS J. HEIDEN

MICHAEL D. MULCAHY
JAMES W. WILLIAMS
THOMAS P. HUSTOLES
JOHN D. PIRICH
WILLIAM J. DANHOF
CLARENCE L. POZZA, JR.
JERRY T. RUPLEY
MICHAEL W. HARTMANN
KENT E. SHAFER
JOHN J. COLLINS, JR.
LAWRENCE D. OWEN
DENNIS K. LOY
THOMAS W. LINN
STEPHEN G. PALMS
GILLIAN STEINHAUER
JEROME R. WATSON
FRANK L. ANDREWS
DONNA J. DONATI
DONALD W. KEIM

DETROIT, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

LARRY J. SAYLOR *
CHARLES E. SCHOLL
RICHARD J. SERYAK
MICHAEL R. ATKINS *
MAUREEN P. AUGHTON
LELAND D. BARRINGER *
TIMOTHY D. SOCHOCKI
THOMAS C. PHILLIPS
HUGH M. SMITH
MARJORY G. BASILE
TERRENCE M. CRAWFORD
RYAN H. HAYWOOD
GEORGE G. MARTIN
CHARLES M. McCUEN *
GERALD E. ROSEN
J. KEVIN TRIMMER
STEVEN D. WEYHING
BRANT A. FREER
JOHN D. STOUT

RICHARD A. GAFFIN
AMANDA VAN DUSEN
BRIAN A. KASER
GARY A. BRUDER
SALLY L. GEIB
KAY I. JOHNSON
E. ELIZABETH PERLMAN
J. SCOTT TIMMER
CHARLES L. SWEERIS
BEVERLY HALL BURNS
JOHN D. RAYIS
STEPHEN J. OTT
LINDA O. GOLDBERG
THOMAS G. APPLEMAN
KAREN A. PULLIAM
NANETTE RUTKA
HAROLD W. BULGER, JR.
GREGORY V. DICENSO
NANCY KEPPELMAN
CYNTHIA B. FAULHABER

RICK A. PACYNSKI
NOAH YANICH
LISA B. ARCHER
MICHAEL P. COAKLEY
STEFAN B. HERPEL
MICHAEL L. LENCIONE
KIRK D. MESSMER
PATRICIA T. QUINN
KEVIN L. SMITH
TIMOTHY S. KNOWLTON
JEFFREY M. McHUGH
DIANE M. SOUBLY
KAREN A. McCOY
THOMAS F. CAVALIER
GERARD McGUIRE
JOHN J. AYAUB
JAMES D. ROBB
CLAUDIA J. ROBERTS
LINDA G. SKLAREN

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
* ALSO ADMITTED IN FLORIDA

December 12, 1984

HAND DELIVERED

Patty Reilly, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: Republican Party of Texas
M.U.R. 1837

Dear Ms. Reilly:

Enclosed please find the response of the Republican Party of Texas in the above-entitled matter.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb
Enclosure

In The
FEDERAL ELECTION COMMISSION

DONNA MOBLEY,

Complainant,

vs. MUR 1837

FRIENDS OF PHIL GRAMM, et al.,

Respondents.

RESPONSE OF THE REPUBLICAN PARTY OF TEXAS

COMES NOW respondent, Republican Party of Texas, by its counsel, Miller, Canfield, Paddock and Stone, and says as follows:

The Texas Republican Congressional Committee, which is shown as a contributor to Friends of Phil Gramm in the complaint filed in this cause, is the Federal Committee designation of the Republican Party of Texas.

I. Answering paragraph I: Respondent is informed and believes the matters alleged are true.

II. Answering paragraph II: Respondent has no knowledge of the matters alleged except that respondent was informed and believed that there was a primary debt in the Friends of Phil Gramm Committee.

III. Answering paragraph III: Respondent has no knowledge of the matters alleged except that it was informed and believed that there was a primary debt in the Friends of Phil Gramm Committee.

8904074052

IV. Answering paragraph IV: Respondent has no knowledge of the matters alleged except that it was informed and believed that the friends of Phil Gramm committee had a primary debt.

V. Answering paragraph V: Respondent has no knowledge of any violations of the Federal election laws and had no information from the FEC indicating that there was no outstanding primary debt.

VI. Answering paragraph VI: Respondent has no knowledge of the matters therein alleged, except that it was informed and believed that there were outstanding primary debts owed by the Friends of Phil Gramm and that contributions to pay such debts were legal and proper.

VII - XI. Answering paragraphs VII - XI: Such allegations made in paragraphs VII through and including XI do not refer to this respondent.

WHEREFORE, Respondent prays this matter be dismissed.

REPUBLICAN PARTY OF TEXAS

By James F. Schoener

James F. Schoener, Esq.
Miller, Canfield, Paddock and Stone
Counsel for Respondent
Suite 1200, 1015 15th Street, N.W.
Washington, DC 20005

FEC/MCPS1

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LAW OFFICES
BEVERIDGE & DIAMOND, P. C.
1333 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20036

(202) 828-0200
TELECOPIER(202)828-0234
WRITER'S DIRECT DIAL NUMBER

(202) 828-0281

HENRY L. DIAMOND
ALBERT J. BEVERIDGE, III
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HAROLD HIMMELMAN
CHRISTOPHER H. BUCKLEY, JR.
EDWARD H. FORGOTSON
J. MARSHALL COLEMAN
STEPHEN L. GORDON
JONATHAN Z. CANNON
ALEXANDER W. SIERCK
JOHN N. HANSON
ANDREW E. MISHKIN
GAINES GWATHMEY, III
CYNTHIA A. LEWIS
KARL S. BOURDEAU
JOHN S. GUTTMANN
STEPHEN R. MELTON
DON G. SCROGGIN
AMY L. EDWARDS
ROBERT BRAGER
JOHN R. ELDRIDGE
RICHARD S. DAVIS
THOMAS RICHICHI
CHRISTINA T. SIMMONS
DEAN H. CANNON
VIRGINIA S. ALBRECHT
PAUL E. SHORB, III
ELISABETH A. ROBINSON

CARL EARDLEY
OF COUNSEL

BEVERIDGE & DIAMOND
SUITE 2506
101 PARK AVENUE
NEW YORK, N. Y. 10178
(212) 557-3355

JIM J. TOZZI
CONSULTING ECONOMIST

December 13, 1984

Ms. Patty Reilly
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20643

Re: MUR 1837

Dear Ms. Reilly:

Enclosed are additional copies of the Pickens' checks to the Gramm campaign that you requested.

Cordially,

Robert Brager

Robert Brager

RB/bjd

Enc.

38298-1

ANNE ALI[illegible]N PICKENS
800 PRESTON BANK BUILDING
DALLAS, TEXAS 75225

PROCESSED--213143394

115

July 12 1984

82-92
1110

PAY TO THE ORDER OF Friends of Phil Gramm $1000.00

One thousand and no/100 DOLLARS

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

Contribution			

⑈000115⑈ ⑆111000928⑆ ⑈234260⑉1115⑈ ⑇0000100000⑇

PRESTON STATE BANK
8111 PRESTON ROAD
DALLAS, TEXAS 75225

38298-2

PAIGE GARDNER PICKENS
800 PRESTON BANK BLDG.
DALLAS, TEXAS 75225

PROCESSED--213143395

116

July 12 1984

82-92
1110

PAY TO THE ORDER OF Friends of Phil Gramm $1000.00

One thousand and no/100 DOLLARS

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

Contribution			

⑈000116⑈ ⑆111000928⑆ ⑈234258⑉1119⑈ ⑇0000100000⑇

PRESTON STATE BANK
8111 PRESTON ROAD
DALLAS, TEXAS 75225

38298-3

R. H. PICKENS
800 PRESTON BANK BUILDING
DALLAS, TEXAS 75225

MERCANTILE NATIONAL BANK
AT DALLAS, TEXAS

№ A 4479

July 12 1984

PAY REGISTERED RD-23772 2000 dols 00 cts DOLLARS $ 2,000.00

TO THE ORDER OF FRIENDS OF PHIL GRAMM

R. H. PICKENS

BY

⑈00004479⑈ ⑆111000614⑆ 0407395583⑈ ⑇0000200000

CLARKE CHECKS

8 9 0 4 0 7 4 5 0 5 5

Pay to the Order of
First City National Bank
of Bryan, Texas
Friends of Phil Gramm
#00-4292-7-01

21314339 4

JY '84 31
PAY ANY BANK
FIRST CITY NAT'L BK.
HOUSTON, TEXAS

Pay to the Order of
First City National Bank
of Bryan, Texas
Friends of Phil Gramm
#00-4292-7-01

21314339 5

JY '84 31
PAY ANY BANK
FIRST CITY NAT'L BK.
HOUSTON, TEXAS

Pay to the Order of
First City National Bank
of Bryan, Texas

JY '84 31
PAY ANY BANK
FIRST CITY NAT'L BK.
HOUSTON, TEXAS

RECEIVED BY THE FEC
84 DEC 26 A9:45

ROBERT P. GRIFFIN *
CLEVELAND THURBER
JAMES F. SCHOENER *
WILLIAM G. BUTLER
FITCH R. WILLIAMS
MICHAEL J. HODGE
COUNSEL

EMMETT E. EAGAN
CONSULTING PARTNER

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 1200
1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

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GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

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PETER P. THURBER
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ROBERT E. HAMMELL
JOSEPH F. MAYCOCK, JR.
ALLEN SCHWARTZ
JOHN W. GELDER, P.C. *
GEORGE E. PARKER III **
RICHARD A. JONES, P.C.
STEVAN UZELAC, P.C.
GILBERT E. GOVE
WOLFGANG HOPPE
GEORGE F. DeCLAIRE *
ROBERT S. KETCHUM, P.C.
SAMUEL J. McKIM III, P.C.
ROCQUE E. LIPFORD, P.C.

JOEL L. PIELL
ROBERT E. GILBERT
MICHAEL P. KNAPP
BRUCE D. BIRGBAUER
DAVID OLMSTEAD
GEORGE T. STEVENSON
JOHN A. THURBER, P.C.
ORIN D. BRUSTAD, P.C.
CARL H. von ENDE
GORDON A. BECKER
DAVID D. JOSWICK, P.C. *
CHARLES L. BURLEIGH, JR.
JOHN A. MARXER, P.C.
GREGORY L. CURTNER, P.C.
DENNIS R. NEIMAN
KENNETH E. KONOP
LEONARD D. GIVENS
W. MACK FAISON
THOMAS J. HEIDEN

MICHAEL D. MULCAHY
JAMES W. WILLIAMS
THOMAS P. HUSTOLES
JOHN D. PIRICH
WILLIAM J. DANHOF
CLARENCE L. POZZA, JR.
JERRY T. RUPLEY
MICHAEL W. HARTMANN
KENT E. SHAFER
JOHN J. COLLINS, JR.
LAWRENCE D. OWEN
DENNIS K. LOY
THOMAS W. LINN
STEPHEN G. PALMS
GILLIAN STEINHAUER
JEROME R. WATSON
FRANK L. ANDREWS
DONNA J. DONATI
DONALD W. KEIM

DETROIT, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

LARRY J. SAYLOR *
CHARLES E. SCHOLL
RICHARD J. SERYAK
MICHAEL R. ATKINS *
MAUREEN P. AUGHTON
LELAND D. BARRINGER *
TIMOTHY D. SOCHOCKI
THOMAS C. PHILLIPS
HUGH M. SMITH
MARJORY G. BASILE
TERRENCE M. CRAWFORD
RYAN H. HAYWOOD
GEORGE G. MARTIN
CHARLES M. McCUEN *
GERALD E. ROSEN
J. KEVIN TRIMMER
STEVEN D. WEYHING
BRANT A. FREER
JOHN D. STOUT

RICHARD A. GAFFIN
AMANDA VAN DUSEN
BRIAN A. KASER
GARY A. BRUDER
SALLY L. GEIB
KAY I. JOHNSON
E. ELIZABETH PERLMAN
J. SCOTT TIMMER
CHARLES L. SWEERIS
BEVERLY HALL BURNS
JOHN D. RAYIS
STEPHEN J. OTT
LINDA O. GOLDBERG
THOMAS G. APPLEMAN
KAREN A. PULLIAM
NANETTE RUTKA
HAROLD W. BULGER, JR
GREGORY V. DiCENSO
NANCY KEPPELMAN
CYNTHIA B. FAULHABER

RICK A. PACYNSKI
NOAH YANICH
LISA B. ARCHER
MICHAEL P. COAKLEY
STEFAN B. HERPEL
MICHAEL L. LENCIONE
KIRK D. MESSMER
PATRICIA T. QUINN
KEVIN L. SMITH
TIMOTHY S. KNOWLTON
JEFFREY M. McHUGH
DIANE M. SOUBLY
KAREN A. McCOY
THOMAS F. CAVALIER
GERARD McGUIRE
JOHN J. AYAUB
JAMES D. ROBB
CLAUDIA J. ROBERTS
LINDA G. SKLAREN

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
* ALSO ADMITTED IN FLORIDA

December 21, 1984

Patty Reilly, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR 1837

Dear Ms. Reilly:

We have heard from Mrs. Mildred W. Simmons of Imperial, Texas, asking that our firm represent her in the above-entitled matter. She could not locate a Designation of Counsel form so we have sent one to her for signature. We will file said Designation form upon our receipt of same.

We ask that the response of individuals heretofore filed be considered adopted on behalf of Mrs. Simmons.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE

By James F. Schoener
James F. Schoener, Esq.

JFS/cb

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ANNEX D TO THE PUBLIC RECORD FILE IN MUR 1837

(SEE NOTE AT FIRST PAGE OF THE MICROFILM FILE)

D

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

John J. Gill, Esquire
American Bankers Association Banker
1120 Connecticut Avenue N.W.
Washington, D.C. 20036

Re: MUR 1837
American Bankers Association
Bank PAC and Brian Meyer, as
treasurer

Dear Mr. Gill:

On November 1, 1984, the Commission notified the American Bankers Association Bank PAC ("the Committee") and Brian Meyer, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by the Committee there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the American Bankers Association Bank PAC and Brian Meyer, as treasurer. Accordingly, the Commission closed its file in this matter as it pertains to the Committee and its treasurer. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074505 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

March 18, 1985

Mr. A.D. Lummus
1413 Amazon
Plano, TX 75075

Re: MUR 1837
Mr. A.D. Lummus

Dear Mr. Lummus:

On November 1, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by you. Accordingly, the Commission closed its file in this matter as it pertains to you. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074506O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Richard A. Brady, Esquire
Covington & Burling
1201 Pennsylvania Avenue N.W.
Washington, D.C. 20044

Re: MUR 1837
Union Pacific Fund for
Effective Government and
Eugene P. Kopp

Dear Mr. Brady:

On November 1, 1984, the Commission notified the Union Pacific Fund for Effective Government ("the Committee") and Eugene P. Kopp, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by the Committee there is no reason to believe that a violation of any statute within its jurisdiction has been committed by Eugene P. Kopp, as treasurer. Accordingly, the Commission closed its file in this matter as it pertains to the Committee its treasurer. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Robert Braeger, Esquire
Beveridge & Diamond, P.C.
1333 New Hampshire Avenue, N.W.
Washington, DC 20036

Re: MUR 1837
Ms. Paige Pickens

Dear Mr. Braeger:

On November 1, 1984, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by your client. Accordingly, the Commission closed its file in this matter as it pertains to your client. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Robert L. Schwarz
Atlas & Hall
P.O. Drawer 3725
McAllen, TX 78502

Re: MUR 1837
Mrs. Frances J. Rogers

Dear Mr. Schwarz:

On November 1, 1984, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by your client. Accordingly, the Commission closed its file in this matter as it pertains to your client. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Raymond A. Albrecht, Esquire
Transco Energy Company
2800 Post Oak Boulevard
Houston, TX 77251

Re: MUR 1837
Mr. Ross Workman

Dear Mr. Albrecht:

On November 1, 1984, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by your client. Accordingly, the Commission closed its file in this matter as it pertains to your client. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. James Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 15th Street N.W.
Washington, D.C. 20005

Re: MUR 1837

Dear Mr. Schoener:

On November 1, 1984, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the following persons: Mr. C.J. Allen, Mr. Douglas Conlee, Mr. Gilbert Denman, Mrs. Andrew Fasken, Mrs. Joan Kunitz. Mr. John White, Mr. Daniel T. Parker, Mr. B. S. Baker, Mr. William Martin, and Mrs. Edith Jones O'Donnell. Accordingly, the Commission closed its file in this matter as it pertains to your clients. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074506 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. Tom Benson
9400 San Pedro
San Antonio, TX 78216

Re: MUR 1837
Mr. Tom Benson

Dear Mr. Benson:

On November 1, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by you. Accordingly, the Commission closed its file in this matter as it pertains to you. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. Willard Hammonds
P.O. Box 6769
Corpus, Christi, TX 78411

Re: MUR 1837
Mr. Willard Hammonds

Dear Mr. Hammonds:

On November 1, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by you. Accordingly, the Commission closed its file in this matter as it pertains to you. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074506 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. Robert L. Trimble
P.O. Box 802087
Dallas, TX 75380-2087

Re: MUR 1837
Robert L. Trimble

Dear Mr. Trimble:

On November 1, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by you. Accordingly, the Commission closed its file in this matter as it pertains to you. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. Arthur Seeligson
1604 NBC Building
San Antonio, TX 78205

Re: MUR 1837
Mr. Arthur Seeligson

Dear Mr. Seeligson:

On November 1, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by you. Accordingly, the Commission closed its file in this matter as it pertains to you. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. William A. Custard
3703 Crescent Avenue
Dallas, TX 75205

Re: MUR 1837
Mr. William A. Custard

Dear Mr. Custard:

On November 1, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by you. Accordingly, the Commission closed its file in this matter as it pertains to you. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8004074570

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. Albert B. Fay
99 N. Post Oak Lane
Houston, TX 77024

Re: MUR 1837
Mr. Albert B. Fay

Dear Mr. Fay:

On November 1, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by you. Accordingly, the Commission closed its file in this matter as it pertains to you. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mrs. Montana McKean
c/o Mr. J.A. Bettersworth
P.O. Box 1314
Seguin, TX 78155

Re: MUR 1837
Mrs. Montana McKean

Dear Mrs. McKean:

On November 1, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by you. Accordingly, the Commission closed its file in this matter as it pertains to you. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. Miles Ambrose, Esquire
O'Connor & Hannan
1919 Pennsylvania Avenue, Suite 800
Washington, D.C. 20006

Re: MUR 1837
American Family PAC

Dear Mr. Ambrose:

On November 1, 1984, the Commission notified the American Family PAC ("the Committee") and Jack Friou, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by the Committee there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the American Family PAC and Jack Friou, as treasurer. Accordingly, the Commission closed its file in this matter as it pertains to the Committee and its treasurer. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074507 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

William H. Schweitzer, Esquire
Baker & Hostetler
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

Re: MUR 1837
National Association of Home Builders Build Political Action Committee and Jerry G. Malloy

Dear Mr. Schweitzer:

On November 1, 1984, the Commission notified the National Association of Home Builders Build Political Action Committee ("the Committee") and Jery G. Malloy, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by the Committee there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the National Home Builders Build Political Action Committee and Jerry G. Malloy, as treasurer. Accordingly, the Commission closed its file in this matter as it pertains to the Committee and its treasurer. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074507 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

David A. Schwarte, Esquire
American Airlines, Inc.
Mail Drop 4C14
P.O. Box 619616
Dallas/Fort Worth Ariport, TX 75261-9616

Re: MUR 1837
Mr. Gene Overbeck

Dear Mr. Schwarte:

On November 1, 1984, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by your client. Accordingly, the Commission closed its file in this matter as it pertains to your client. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074307

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Robert Braeger, Esquire
Beveridge & Diamond, P.C.
1333 New Hampshire Avenue, N.W.
Washington, DC 20036

Re: MUR 1837
Ms. Anne Pickens

Dear Mr. Braeger:

On November 1, 1984, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by your client. Accordingly, the Commission closed its file in this matter as it pertains to your client. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074507

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. Hugh Halff, Jr.
3355 Cherry Ridge Drive #201
P.O. Box 4GG
San Antonio, TX 78201

Re: MUR 1837
Mr. Hugh Halff

Dear Mr. Halff:

On November 1, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by you. Accordingly, the Commission closed its file in this matter as it pertains to you. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Jerry P. Fortenberry, Esquire
Corporate Counsel
Tennaco Inc.
P.O. Box 2511
Houston, TX 77001

Re: MUR 1837
Tennaco Employees' Good
Government Fund

Dear Mr. Fortenberry:

On November 1, 1984, the Commission notified the Tennaco Employees Good Government Fund ("the Committee") and A.J. Pate, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by the Committee there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the Tennaco Employees' Good Government Fund and A.J. Pate, as treasurer. Accordingly, the Commission closed its file in this matter as it pertains to the Committee and its treasurer. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074507 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

J. Patrick Berry, Esquire
Baker & Botts
1701 Pennsylvania Avenue N.W.
Washington, D.C. 20006

Re: MUR 1837
Houston Industries Political Action Committee, and David M. McClanahan

Dear Mr. Berry:

On November 1, 1984, the Commission notified the Houston Industries Political Action Committee ("the Committee") and David M. McClanahan, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by the Committee there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the Houston Industries Political Action Committee and David M. McClanahan, as treasurer. Accordingly, the Commission closed its file in this matter as it pertains to the Committee and its treasurer. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

National Federation of Independent
Business and T.L. Kuchenriter,
as treasurer
150 West 20th Avenue
San Mateo, CA 94403

Re: MUR 1837
National Federation of
Independent Business and T.L.
Kuchenriter, as treasurer

Dear Mr. Kuchenriter:

On November 5, 1984, the Commission notified the National Federation of Independent Business Political Action Committee ("the Committee") and T.L. Kuchenriter, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by the Committee there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the National Federation of Independent Business Political Action Committee and you, as treasurer. Accordingly, the Commission closed its file in this matter as it pertains to the Committee and its treasurer. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8904074300 80

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. G.W. Sanford
1803 Denton Drive
Carrollton, TX 75006

Re: MUR 1837
Mr. G.W. Sanford

Dear Mr. Sanford:

On November 1, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 5, 1985, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of any statute within its jurisdiction has been committed by you. Accordingly, the Commission closed its file in this matter as it pertains to you. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

9904074308 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1985

Mr. Walter M. Mischer, Jr.
2727 North Loop West
Houston, TX 77008

Re: MUR 1837
Mr. Walter M. Mischer, Jr.

Dear Mr. Mischer:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8907430082

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

March 18, 1985

Mr. Refugio Gonzales, Jr.
8830 Huffsmith Road
Tonball, TX 77375

Re: MUR 1837
Mr. Refugio Gonzales, Jr.

Dear Mr. Gonzales:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074508 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Frederick Meyer
5830 Averill Way
Dallas, Texas 75225

Re: MUR 1837
Frederick Meyer

Dear Mr. Meyer:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074508 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Frederick Meyer
5830 Averill Way
Dallas, Texas 75225

Re: MUR 1837
Frederick Meyer

Dear Mr. Meyer:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074508 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. James Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 15th Street N.W.
Washington, D.C. 20005

Re: MUR 1837

Dear Mr. Schoener:

The Federal Election Commission notified your clients on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to the following persons: Ms. Ebby Halliday Acers, Ms. Helen Allen, Mrs. Margaret Alkek, Mr. William L. Anderson, Mr. James Arnold, Mr. Arthur Allvis, Mr. Roland Arthur, Mrs. Helen Bankston, Mr. Philip Bolin, Mr. Richard A. Box, Orthal E. Brand, Mr. L.D. Brinkman, Mrs. L.D. Brinkman, Mr. Hogan T. Brooks, Mr. Bruce Brookshire, Mr. Fred S. Brown, Mr. Sam Buchanan, Mr. Bruce Calder, Mr. Gene Canavan, Mr. Donald M. Carlton, Mr. Frank Cass, Mrs. Mary Cass, Mr. Michael L. Cass, Mr. William G. Cass, Mr. Harold Courson, Mr. William Crain, Mr. James Lewis Connor III, Mrs. Michelle Connor, Mr. David Crowley, Mr. Joel Daniel, Mr. John W. Dixon, Mr. Richard Doornbos, Mrs. Sally Emde, Mr. William Emde, Mr. Wilton Fair, Mr. Ernest Fay, Mrs. Margaret Folsom, Mr. Robert Folsom, Mr. R.L. Foree, Mr. Jerry Freeman, Mr. Peter Gill, Mr. Thomas E. Hartin, Mr. George S. Hawn, Mr. Paul K Herder, Mr. James E. Holcomb, Mr. Frank P. Horlock, Mrs. Edith Huebrer, Mr. Harvey Huie, Mrs. H.L. Hunt, Mrs. Nancy A. Hunt, Mr. Ray L. Hunt, Mr. J.I. Jackson, Mr. Abe Katz, Mr. Thomas Keeler, Mrs. Ella Kellum, Mr. James E. Kellum, Mr. Joe B. Kercheville, Mrs. Frances W. Klein, Ms. Kimberly Klein, Mr. Louis Kreditor, Mr. David Lacey, Mrs. Beth Logue, Lt. Gen. Sam Maddux, Jr., Mrs. Karen Martin, Mr. Frank Mayborn, Mrs. Frank Mayborn, Mrs. Catherine McAnally, Mrs. Carolyn McElyea, Mr. Eugene McElyea, Mr. A.P. McEvoy, Mrs. Drayton McLane, Jr., Mr. L.A. McNeil, Mrs. Geraldine Miller, Mr. Vance C. Miller, Mrs. Bettye Nowlin, Mr. Carl E. Oates, Mrs. Carl E. Oates, Mr. Clifton Ovrecash, Ms. Laurie Ramsey, Mr. Edward Rea, Mrs. Elga Rea, the Republican Party of Texas, Mr. T.L. Roach, Dr. S.J. Rogers, Mr. Glen E. Roney, Mr. Frank Scanio, Jr., Mr. Herbert Schift, Mr. R.J.

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Schumacher, Mr. Marvin Selig, Mr. S.S. Seltzer, Jr., Mr. J.T. Shelton, Mrs. Mildred W. Simmons, Mr. Richard T. Sink, Mrs. Merle Stieler, Mr. David Tacke, Mrs. David Tacke, Mr. Wayne Thomas, Mrs. Virginia Upham, Jr., Mr. Robert L. Wheelock, Jr., Mrs. Lelia H. Windom, Dr.Robert E. Windom, and Mrs. H.B. Zachry.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074500 87

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Dr. Robert West
8700 Tesero Drive
San Antonio, TX 78286

Re: MUR 1837
Dr. Robert West

Dear Dr. West:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mrs. Theresa Tapp
602 Slaton Road
Lubbeck, TX 79408

Re: MUR 1837
Mrs. Theresa Tapp

Dear Mrs. Tapp:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074308 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. John Stemmons
2700 Stemmons Freeway
Dallas, TX 25207

Re: MUR 1837
Mr. John Stemmons

Dear Mr. Stemmons:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074300

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. Weldon H. Smith
7500 San Felipe St.
Suit 666
Houston, TX 77063

Re: MUR 1837
Mr. Weldon H. Smith

Dear Mr. Smith:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074509 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mrs. Pat Schift
5307 E. Mockingbird Lane
Dallas, TX 75207

Re: MUR 1837
Mrs. Schift

Dear Mrs. Schift:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. Walter Mischer
P.O. Box 7479
Houston, TX 77008

Re: MUR 1837
Mr. Walter Mischer

Dear Mr. Mischer:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. Michael D. Hutchison
5949 Sherry Lane, Suite 700
Dallas, TX 75225

Re: MUR 1837
Mr. Michael Hutchison

Dear Mr. Hutchison:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074309 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. N.M. Yost
P.O. Box 678
Gainesville, TX 76240

Re: MUR 1837
Mr. N. M. Yost

Dear Mr. Yost:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074509 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mrs. Wendell Hobbs
Route 1, Box 590
McAllen, TX 78504

Re: MUR 1837
Mrs. Wendell Hobbs

Dear Mrs. Hobbs:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074506

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. Wendell Hobbs
Route 1, Box 590
McAllen, TX 78504

Re: MUR 1837
Mr. Wendell Hobbs

Dear Mr. Hobbs:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074307

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. Frank Glover
P.O. Box 287
Mount Pleasant, TX 75455

Re: MUR 1837
Mr. Frank Glover

Dear Mr. Glover:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074 5098

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. Donald S. Elliot
P.O. Box 6867
San Antonio, TX 78209

Re: MUR 1837
Mr. Donald S. Elliot

Dear Mr. Elliot:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

9904074509

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mrs. Karen Edwards
P.O. Box 2431
Big Spring, TX 79720

Re: MUR 1837
Mrs. Karen Edwards

Dear Mrs. Edwards:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074510

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. Roy C. Coffee
6201 Hillcrest Street
Dallas, TX 75205

Re: MUR 1837
Mr. Roy C. Coffee

Dear Mr. Coffee:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074510 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. Arthur Cary
2519 Farrington
Dallas, TX 75207

Re: MUR 1837
Mr. Arthur Cary

Dear Mr. Cary:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074310 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mrs. Elloine M. Calder
165 Hartford Building
Dallas, TX 75201

Re: MUR 1837
Mrs. Elloine M. Calder

Dear Mrs. Calder:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074510 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. George Bush
17630 Davenport Road
Dallas, TX 75252

Re: MUR 1837
Mr. George Bush

Dear Mr. Bush:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074510 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. L.D. Burns
One Parker Square
Suite 500
Wichita, TX 00817

Re: MUR 1837
Mr. L.D. Burns

Dear Mr. Burns:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074510 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. William Burford
1400 Main Street
Dallas, TX 75202

Re: MUR 1837
Mr. William Burford

Dear Mr. Burford:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8907451506

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. Robert Bruni
6326 Sovereign Drive
Suite 250-2
San Antonio, TX 78229

Re: MUR 1837
Mr. Robert Bruni

Dear Mr. Bruni:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. E.D. Bottom
1200 Elm Street
Mission, TX

Re: MUR 1837
Mr. E.D. Bottom

Dear Mr. Bottom:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074508

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mrs. Adelle Bottom
1200 Elm Street
Mission, TX

Re: MUR 1837
Mrs. Adelle Bottom

Dear Mrs. Bottom:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mrs. E.T. Starnes
219 Hertiage Oaks
Houston, TX 77024

Re: MUR 1837
Mrs. E.T. Starnes

Dear Mrs. Starnes:

The Federal Election Commission notified you on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to you.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074510

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Henry Simpson, Esquire
Tobolowsky, Prager, & Schlinger
1900 South Lad Center
Dallas, TX 75201

Re: MUR 1837
Mr. John Sauer

Dear Mr. Simpson:

The Federal Election Commission notified your client on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to your client.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Rice M. Tilley, Jr., Esquire
Texas American Bank Building
Forth Worth, TX 76102

Re: MUR 1837
Mr. Lowden

Dear Mr. Tilley:

The Federal Election Commission notified your client on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to your client.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8204074511 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Bob Parks, Esquire
305 East Fourth
P.O.Box 1438
Monahans, TX 79756

Re: MUR 1837
Jessie V. Kniveeton

Dear Mr. Parks:

The Federal Election Commission notified your client on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to your client.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Donald F. Santa, Jr.
Andrews & Kurth
1747 Pennsylvania Avenue, N.W.
Washington, DC 20006

Re: MUR 1837
Robert L. Bradly

Dear Mr. Santa:

The Federal Election Commission notified your client on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to your client.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

8904074514

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1985

Mr. James Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 15th Street N.W.
Washington, D.C. 20005

Re: MUR 1837

Dear Mr. Schoener:

The Federal Election Commission notified your clients on November 5, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time.

On March 5, 1985, the Commission addressed the allegations in the complaint. After considering the circumstances of this matter, the Commission has determined to take no action and close its file as it pertains to the following persons: Ms. Ebby Halliday Acers, Ms. Helen Allen, Mrs. Margaret Alkek, Mr. William L. Anderson, Mr. James Arnold, Mr. Arthur Allvis, Mr. Roland Arthur, Mrs. Helen Bankston, Mr. Philip Bolin, Mr. Richard A. Box, Orthal E. Brand, Mr. L.D. Brinkman, Mrs. L.D. Brinkman, Mr. Hogan T. Brooks, Mr. Bruce Brookshire, Mr. Fred S. Brown, Mr. Sam Buchanan, Mr. Bruce Calder, Mr. Gene Canavan, Mr. Donald M. Carlton, Mr. Frank Cass, Mrs. Mary Cass, Mr. Michael L. Cass, Mr. William G. Cass, Mr. Harold Courson, Mr. William Crain, Mr. James Lewis Connor III, Mrs. Michelle Connor, Mr. David Crowley, Mr. Joel Daniel, Mr. John W. Dixon, Mr. Richard Doornbos, Mrs. Sally Emde, Mr. William Emde, Mr. Wilton Fair, Mr. Ernest Fay, Mrs. Margaret Folsom, Mr. Robert Folsom, Mr. R.L. Foree, Mr. Jerry Freeman, Mr. Peter Gill, Mr. Thomas E. Hartin, Mr. George S. Hawn, Mr. Paul K Herder, Mr. James E. Holcomb, Mr. Frank P. Horlock, Mrs. Edith Huebrer, Mr. Harvey Huie, Mrs. H.L. Hunt, Mrs. Nancy A. Hunt, Mr. Ray L. Hunt, Mr. J.I. Jackson, Mr. Abe Katz, Mr. Thomas Keeler, Mrs. Ella Kellum, Mr. James E. Kellum, Mr. Joe B. Kercheville, Mrs. Frances W. Klein, Ms. Kimberly Klein, Mr. Louis Kreditor, Mr. David Lacey, Mrs. Beth Logue, Lt. Gen. Sam Maddux, Jr., Mrs. Karen Martin, Mr. Frank Mayborn, Mrs. Frank Mayborn, Mrs. Catherine McAnally, Mrs. Carolyn McElyea, Mr. Eugene McElyea, Mr. A.P. McEvoy, Mrs. Drayton McLane, Jr., Mr. L.A. McNeil, Mrs. Geraldine Miller, Mr. Vance C. Miller, Mrs. Bettye Nowlin, Mr. Carl E. Oates, Mrs. Carl E. Oates, Mr. Clifton Ovrecash, Ms. Laurie Ramsey, Mr. Edward Rea, Mrs. Elga Rea, the Republican Party of Texas, Mr. T.L. Roach, Dr. S.J. Rogers, Mr. Glen E. Roney, Mr. Frank Scanio, Jr., Mr. Herbert Schift, Mr. R.J.

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Schumacher, Mr. Marvin Selig, Mr. S.S. Seltzer, Jr., Mr. J.T. Shelton, Mrs. Mildred W. Simmons, Mr. Richard T. Sink, Mrs. Merle Stieler, Mr. David Tacke, Mrs. David Tacke, Mr. Wayne Thomas, Mrs. Virginia Upham, Jr., Mr. Robert L. Wheelock, Jr., Mrs. Lelia H. Windom, Dr.Robert E. Windom, and Mrs. H.B. Zachry.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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

If you should have any questions, please direct them to Patty Reilly, staff attorney assigned to this matter, at 523-4143.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ANNEX E TO THE PUBLIC RECORD FILE IN MUR 1837

(SEE NOTE AT FIRST PAGE OF THE MICROFILM FILE)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Walter M. Mischer
P.O. Box 7479
Houston, TX 77008

RE: MUR 1837

Dear Mr. Mischer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074511 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Ms. Catherine W. McAnally
620 South Taylor
Amarillo, TX 79101

RE: MUR 1837

Dear Ms. McAnally:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074519

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Honorable Eugene M. McElyea
P.O. Box 1167
Crockett, TX 75835

RE: MUR 1837

Dear Honorable McElyea:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. A.P. McEvoy
6301 Preston Parkway
Dallas, TX 75205

RE: MUR 1837

Dear Mr. McEvoy:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Montana McKean
P.O. Box 1169
Sequin, TX 78155

RE: MUR 1837

Dear Mr. McKean:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074512 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. L.A. McNeil
P.O. Box 2928
Corpus Christi, TX 78403

RE: MUR 1837

Dear Mr. McNeil:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074512 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Vance C. Miller
2001 Bryan Tower, 30th Floor
Dallas, TX 75201

RE: MUR 1837

Dear Mr. Miller:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074512 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Geraldine Miller
2001 Bryan Tower, 30th Floor
Dallas, TX 75201

RE: MUR 1837

Dear Mrs. Miller:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074512 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

General Sam Maddux, Jr.
500 Alameda Circle
San Antonio, TX 78212

RE: MUR 1837

Dear General Maddux:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074512 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Carolyn McElyea
P.O. Box 1167
Crockett, TX 75835

RE: MUR 1837

Dear Mrs. McElyea:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Frank W. Mayborn
10 South 3rd Street
Temple, TX 76501

RE: MUR 1837

Dear Mr. Mayborn:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074512 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Frank W. Mayborn
10 South 3rd Street
Temple, TX 76501

RE: MUR 1837

Dear Mrs. Mayborn:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Merle P. Stieler
P.O. Box 308
Comfort, TX 78013

RE: MUR 1837

Dear Mrs. Stieler:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074530

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. E. Trine Starnes
219 Heritage Oaks
Houston, TX 77024

RE: MUR 1837

Dear Mr. Starnes:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074531

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Arthur Seeligson, III
1604 NBC Building
San Antonio, TX 78205

RE: MUR 1837

Dear Mr. Selligson:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074513 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mr. John M. Stemmons
2700 Stemmons Freeway
Dallas, TX 75207

RE: MUR 1837

Dear Mr. Stemmons:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074513 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Richard T. Sink
P.O. Box BWH
Wichita Falls, TX 76307

RE: MUR 1837

Dear Mr. Sink:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074513 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Weldon H. Smith
7500 San Felipe Street
Suite 666
Houston, TX 77063

RE: MUR 1837

Dear Mr. Smith:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074513 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. R.J. Schumacher
3402 Texas American Bank Building
Ft. Worth, TX 76102

RE: MUR 1837

Dear Mr. Schumacher:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074513 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. G.E. Roney
3316 Kent Lane
McAllen, TX 78501

RE: MUR 1837

Dear Mr. Roney:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074513 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Ms. Laurie Ramsey
3510 Cranbrook
Wichita Falls, TX 76308

RE: MUR 1837

Dear Ms. Ramsey:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074351 38

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. T.L. Roach, Jr.
P.O. Box 1871
Amarillo, TX 79105

RE: MUR 1837

Dear Mr. Roach:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074513 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Dr. S.J. Rogers
P.O. Box 1310
Beaumont, TX 77006

RE: MUR 1837

Dear Dr. Rogers:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074514 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mr. Edward Rea
5305 Mariners Drive
Plano, TX 75075

RE: MUR 1837

Dear Mr. Rea:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8900745141

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Elga Rea
5305 Mariners Drive
Plano, TX 75075

RE: MUR 1837

Dear Mrs. Rea:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074514 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Ms. Paige Pickens
3926 Potomac Street
Dallas, TX 75205

RE: MUR 1837

Dear Ms. Pickens:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074514 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Ms. Anne Pickens
3926 Potomac Street
Dallas, TX 75205

RE: MUR 1837

Dear Mrs. Pickens:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074514 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Daniel T. Parker
P.O. Box 107
Houston, TX 77001

RE: MUR 1837

Dear Mr. Parker:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074514 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. C.O. Overcash
3850 Bellaire Circle
Ft. Worth, TX 76109

RE: MUR 1837

Dear Mr. Overcash:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

9904074514 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Helen Allen
3207 Groveland Lane
Houston, TX 77019

RE: MUR 1837

Dear Mrs. Allen:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074514 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Dr. William L. Anderson
P.O. Box 539
Addison, TX 75001

RE: MUR 1837

Dear Dr. Anderson:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074514 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. James W. Arnold
P.O. Box 6566
Tyler, TX 75711

RE: MUR 1837

Dear Mr. Arnold:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074351 49

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Alvis Arthur
1711 North Beltline Road
P.O. Box 153648
Irving, TX 75015

RE: MUR 1837

Dear Mr. Arthur:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074515O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Maragret Alkek
3011 North Main
Victoria, TX 77901

RE: MUR 1837

Dear Mrs. Alkek:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074511

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. A. Don Lummus
1413 Amazon
Plano, TX 75075

RE: MUR 1837

Dear Mr. Lummus:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

9204074515 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Beth Logue
1300 One Energy Square
Dallas, TX 75206

RE: MUR 1837

Dear Mrs. Logue:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

3904074515 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. William David Lacy
3210 Wooded Aires
Waco, TX 76703

RE: MUR 1837

Dear Mr. Lacy:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074515 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mr. James E. Kellum
2114 Sunnyvale
Grand Prairie, TX 34575

RE: MUR 1837

Dear Mr. Kellum:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074515 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Jessie V. Kniveton
1506 South Ike
Monahans, TX 79756

RE: MUR 1837

Dear Mrs. Kniveton:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074515 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Louis W. Kreditor
1365 Regal Row
Dallas, TX 75247

RE: MUR 1837

Dear Mr. Kreditor:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074157

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Ms. G. Kimberly Klein
620 South Taylor
Amarillo, TX 79101

RE: MUR 1837

Dear Ms. Klein:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074518

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mrs. Ella M. Kellum
2114 Sunnyvale
Grand Praire, TX 35475

RE: MUR 1837

Dear Mrs. Kellum:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074515 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Joan Kunitz
P.O. Box 1053
Sinton, TX 78387

RE: MUR 1837

Dear Mrs. Kunitz:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074516O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Frances W. Klein
1702 North Julian
Amarillo, TX 79102

RE: MUR 1837

Dear Mrs. Klein:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

9904074561

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Thomas T. Keeler
P.O. Box 7535
Corpus Christi, TX 78415

RE: MUR 1837

Dear Mr. Keeler:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074516 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Michael D. Hutchison
5949 Sherry Lane, Suite 700
Dallas, TX 75225

RE: MUR 1837

Dear Mr. Hutchison:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074516 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Frank P. Horlock, Jr.
P.O. Box 52608
Houston, TX 77052

RE: MUR 1837

Dear Mr. Horlock:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074516 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. James C. Holcomb
2201 Teckla
Amarillo, TX 79106

RE: MUR 1837

Dear Mr. Holcomb:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074516 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Harvey Huie
14400 Dallas Parkway
P.O. Box 402331
Dallas, TX 75240

RE: MUR 1837

Dear Mr. Huie:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2204074351666

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. H. Wendell Hobbs
Route 1, Box 590
McAllen, TX 78504

RE: MUR 1837

Dear Mrs. Hobbs:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

9904074351167

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Paul K. Herder
4202 Highway 90 East
San Antonio, TX 78219

RE: MUR 1837

Dear Mr. Herder:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074518

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mr. Willard H. Hammonds
P.O. Box 6769
Corpus Christi, TX 78411

RE: MUR 1837

Dear Mr. Hammonds:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074516 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Hugh Halff, Jr.
3355 Cherry Ridge Road
Suite 201
San Antonio, TX 78230

RE: MUR 1837

Dear Mr. Halff:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074517 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Thomas E. Hartin
5905 Club Oaks Drive
Dallas, TX 75248

RE: MUR 1837

Dear Mr. Hartin:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074517 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Frank Glover
P.O. Box 287
Mt. Pleasant, TX 75455

RE: MUR 1837

Dear Mr. Glover:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074517 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Wilton H. Fair
P.O. Box 689
Tyler, TX 75710

RE: MUR 1837

Dear Mr. Fair:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074517 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. R.L. Foree, Sr.
3300 InterFirst One Building
Dallas, TX 75202

RE: MUR 1837

Dear Mr. Foree:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074517 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Robert S. Folsom
16475 Dallas Parkway, Suite 800
Dallas, TX 75248

RE: MUR 1837

Dear Mr. Folsom:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074517 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Gene E. Overbeck
1101 17th Street, N.W.
Washington, D.C. 20036

RE: MUR 1837

Dear Mr. Overbeck:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074517 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Carl E. Oates
6924 Stefani
Dallas, TX 75225

RE: MUR 1837

Dear Mr. Oates:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074517 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Carl E. Oates
6924 Stefani
Dallas, TX 75225

RE: MUR 1837

Dear Mrs. Oates:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074518

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Bettye Nowlin
510 Hazelwood
Ft. Worth, TX 76107

RE: MUR 1837

Dear Mrs. Nowlin:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074579

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Karen Martin
1404 Country Club Drive
Midland, TX 79701

RE: MUR 1837

Dear Mrs. Martin:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074518 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. William H. Martin
1404 Country Club Drive
Midland, TX 79701

RE: MUR 1837

Dear Mr. Martin:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8900745181

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. N.M. Yost
P.O. Box 678
Gainesville, TX 76240

RE: MUR 1837

Dear Mr. Yost:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074518 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. William O. Emde
9507 Harwin Drive
Houston, TX 77036

RE: MUR 1837

Dear Mr. Emde:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074518 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Albert Fay, Jr.
99 North Post Oak Lane
Houston, TX 77024

RE: MUR 1837

Dear Mr. Fay:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074518 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Margaret Folsom
16475 Dallas Parkway, Suite 800
Dallas, TX 75248

RE: MUR 1837

Dear Mrs. Folsom:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2904074518 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Sally Emde
9507 Harwin Drive
Houston, TX 77036

RE: MUR 1837

Dear Mrs. Emde:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074518 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Donald S. Elliott
P.O. Box 6867
San Antonio, TX 78209

RE: MUR 1837

Dear Mr. Elliott:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074518 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Ms. Karen Edwards
P.O. Box 2431
Big Spring, TX 79720

RE: MUR 1837

Dear Ms. Edwards:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074518

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Richard Doornbos
P.O. Box 696
Nederland, TX 77627

RE: MUR 1837

Dear Mr. Doornbos:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. John W. Dixon
5065 Lakehill Court
Dallas, TX 75220

RE: MUR 1837

Dear Mr. Dixon:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074519 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Gilbert M. Denman, Jr.
535 San Antonio Bank & Trust Building
San Antonio, TX 78205

RE: MUR 1837

Dear Mr. Denman:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8900745191

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Joel Daniel
P.O. Box 130
Llano, TX 78643

RE: MUR 1837

Dear Mr. Daniel:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074519 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mr. Roy C. Coffee
6201 Hillcrest
Dallas, TX 75205

RE: MUR 1837

Dear Mr. Coffee:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074519 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Dr. William H. Crain
2511 San Gabriel
Austin, TX 78705

RE: MUR 1837

Dear Dr. Crain:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074519 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. W. Allen Custard
3703 Crescent Avenue
Dallas, TX 75205

RE: MUR 1837

Dear Mr. Custard:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074519 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Michael L. Cass
2727 Routh Street
Dallas, TX 75201

RE: MUR 1837

Dear Mr. Cass:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074519 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Mary Cass
2727 Routh Street
Dallas, TX 75201

RE: MUR 1837

Dear Mrs. Cass:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074519 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. William Cass
2727 Routh Street
Dallas, TX 75201

RE: MUR 1837

Dear Mr. Cass:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074519 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Frank Cass
2727 Routh Street
Dallas, TX 75201

RE: MUR 1837

Dear Mr. Cass:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074519 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Donald M. Carlton
4601 Cat Mountain Drive
Austin, TX 78731

RE: MUR 1837

Dear Mr. Carlton:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074520 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Arthur Cary
2519 Farrington
Dallas, TX 75207

RE: MUR 1837

Dear Mr. Cary:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074520 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mr. Bruce Calder
200 Hartford Building
Dallas, TX 75201

RE: MUR 1837

Dear Mr. Calder:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074520 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Elloine M. Calder
265 Hartford Building
Dallas, TX 75201

RE: MUR 1837

Dear Mrs. Calder:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074520 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. George W. Bush
17630 Davenport Road
Dallas, TX 75252

RE: MUR 1837

Dear Mr. Bush:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074520 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. L.D. Burns
One Parker Square, Suite #500
Wichita Falls, TX 70817

RE: MUR 1837

Dear Mr. Burns:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074520 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. William E. Burford
1400 Main Street
Dallas, TX 75202

RE: MUR 1837

Dear Mr. Burford:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074520 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. B.G. Brookshire
P.O. Box 1411
Tyler, TX 75701

RE: MUR 1837

Dear Mr. Brookshire:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074520 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. L.D. Brinkman
2133 Sidney Baker Street
Kerrville, TX 78028

RE: MUR 1837

Dear Mrs. Brinkman:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074520 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. L.D. Brinkman
2133 Sidney Baker Street
Kerrville, TX 78028

RE: MUR 1837

Dear Mr. Brinkman:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble

Lawrence M. Noble
General Counsel

8904074520 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mr. D.E. Brand
P.O. Box 1840
McAllen, TX 78501

RE: MUR 1837

Dear Mr. Brand:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. D. Phil Bolin
510 Hamilton Building
Wichita Falls, TX 76301

RE: MUR 1837

Dear Mr. Bolin:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Helen Bankston
4747 LBJ Freeway
Dallas, TX 75234

RE: MUR 1837

Dear Mrs. Bankston:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Louis A. Beecher I, Jr.
3801 Beverly Drive
Dallas, TX 75205

RE: MUR 1837

Dear Mr. Beecher:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Ebby Halliday Acers
5999 West Northwest Highway
Dallas, TX 75225

RE: MUR 1837

Dear Mrs. Acers:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Roland Arthur
1711 North Beltline Road
P.O. Box 153648
Irving, TX 75015

RE: MUR 1837

Dear Mr. Arthur:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. C.J. Allen
P.O. Box 3902
Bryan, TX 77805

RE: MUR 1837

Dear Mr. Allen:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Adelle Bottom
1200 Elm
Mission, TX 78572

RE: MUR 1837

Dear Mrs. Bottom:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mr. Hogan T. Brooks
P.O. Box 1428
Conroe, TX 77305

RE: MUR 1837

Dear Mr. Brooks:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Fred Brown
P.O. Box 688
Mexia, TX 76667

RE: MUR 1837

Dear Mr. Brown:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074521 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Robert J. Bruni
6326 Sovereign Drive, Suite 250-2
San Antonio, TX 78229

RE: MUR 1837

Dear Mr. Bruni:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074522 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Sam Buchanan
P.O. Box 89
Texarkana, AR 75504

RE: MUR 1837

Dear Mr. Buchanan:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Douglas M. Conlee
Box 7247
Waco, TX 76710

RE: MUR 1837

Dear Mr. Conlee:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074522

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Michelle K. Connor
3020 Duke
Houston, TX 77005

RE: MUR 1837

Dear Mrs. Connor:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

9904074522 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Harold D. Courson
Box 809
Perryton, TX 79070

RE: MUR 1837

Dear Mr. Courson:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074522 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Ames Lewis Connor, III
3020 Duke
Houston, TX 77005

RE: MUR 1837

Dear Mr. Connor:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074522 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Andrew Fasken
3140 Clark Lane
Paris, TX 75460

RE: MUR 1837

Dear Mrs. Fasken:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074522 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Pat Schiff
5307 East Mockingbird Lane
Dallas, TX 75206

RE: MUR 1837

Dear Mrs. Schiff:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074527

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Joe B. Kercheville
100 NBC Building
San Antonio, TX 78205

RE: MUR 1837

Dear Mr. Kercheville:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074522 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. S.S. Seltzer, Jr.
4025 Ocean Drive
P.O. Box 6382
Corpus Christi, TX 78411

RE: MUR 1837

Dear Mr. Seltzer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074522 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mrs. Cathy Sowers
4811 32nd Street
Dickinson, TX 77539

RE: MUR 1837

Dear Mrs. Sowers:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074523 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. J.T. Shelton
3609 Pioneer Parkway
Arlington, TX 76013

RE: MUR 1837

Dear Mr. Shelton:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Herbert Schiff
5307 Mockingbird Lane
Dallas, TX 75206

RE: MUR 1837

Dear Mr. Schiff:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074523 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Gene F. Canavan
P.O. Box 16007
San Antonio, TX 78216

RE: MUR 1837

Dear Mr. Canavan:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Jerry W. Freeman
7524 Glen Albens
Dallas, TX 75225

RE: MUR 1837

Dear Mr. Freeman:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074534

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Phillip J. Friou, Treasurer
c/o Dean Sharp
American Family Political
Action Committee
1300 19th Street, NW., Suite 404
Washington, D.C. 20036

RE: MUR 1837

Dear Mr. Friou:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074523 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mr. R.R. Lowdon
2727 West Seventh Street
Ft. Worth, TX 76107

RE: MUR 1837

Dear Mr. Lowdon:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074523 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Jerry G. Malloy, Treasurer
Build Political Action Committee
of the National Association
of Home Builders
15th & M Streets, N.W., NW Station
Washington, D.C. 20005

RE: MUR 1837

Dear Mr. Malloy:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8204074532337

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Refugio Gonzales, Jr.
8830 Huffsmith Road
Tomball, TX 77375

RE: MUR 1837

Dear Mr. Gonzales:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074523 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. John Sauer
P.O. Box 470063
Dallas, TX 75247

RE: MUR 1837

Dear Mr. Sauer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074523 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Marvin Selig
P.O. Box 911
Sequin, TX 78155

RE: MUR 1837

Dear Mr. Selig:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074524 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Wayne Thomas
P.O. Box 1917
Bereford, TX 79045

RE: MUR 1837

Dear Mr. Thomas:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074524 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. David Tacke
5410 Royal Crest
Dallas, TX 75229

RE: MUR 1837

Dear Mrs. Tacke:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

3900745242

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Robert L. Triable
P.O. Box 8020089
Dallas, TX 75380

RE: MUR 1837

Dear Mr. Triable:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

39040743243

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mr. David R. Tacke
5410 Royal Crest
Dallas, TX 75229

RE: MUR 1837

Dear Mr. Tacke:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074524

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Theresa Tapp
602 Slaton Raod
Lubbock, TX 79408

RE: MUR 1837

Dear Mrs. Tapp:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074524 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Chester R. Upham, Jr.
P.O. Box 940
Mineral Wells, TX 76067

RE: MUR 1837

Dear Mrs. Upham:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074524 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Esther Westby-Aus
1220 N.E. 17th, #6A
Portland, OR 97232

RE: MUR 1837

Dear Mrs. Westby-Aus:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8900745247

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Dr. Robert V. West, Jr.
8700 Tesoro Drive
San Antonio, TX 78286

RE: MUR 1837

Dear Dr. West:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. John H. White
P.O. Box 16309
San Antonio, TX 78216

RE: MUR 1837

Dear Mr. White:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

3904074352449

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Lellia Windom
1562 South Drie
Sarasota, FL 33579

RE: MUR 1837

Dear Mrs. Windom:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074525 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Dr. Robert E. Windom
1562 South Drive
Sarasota, FL 33579

RE: MUR 1837

Dear Dr. Windom:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Walier M. Mischer, Jr.
2727 North Loop West
Houston, TX 77008

RE: MUR 1837

Dear Mr. Mischer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074525252

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Anita Rogers
P.O. Box 1077
Edinburg, TX 78539

RE: MUR 1837

Dear Mrs. Rogers:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. G.W. Sanford
1803 Denton Drive
Carrollton, TX 75006

RE: MUR 1837

Dear Mr. Sanford:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074525 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Frank J. Scanio, Jr.
LaRosa Ranch
Woodsboro, TX 78393

RE: MUR 1837

Dear Mr. Scanio:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8900745255

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Ross Workman
P.O. Box 1396
Houston, TX 77251

RE: MUR 1837

Dear Mr. Workman:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2 9 0 4 0 7 4 5 2 5 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Mildred W. Simmons
P.O. Box 186
Imperial, TX 79743

RE: MUR 1837

Dear Mrs. Simmons:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074525257

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Edith Jones O'Donnell
3355 InterFirst One
Dallas, TX 75202

RE: MUR 1837

Dear Mrs. O'Donnell:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074528

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. David Crowley
10265 Inwood Road
Dallas, TX 75229

RE: MUR 1837

Dear Mr. Crowley:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074525 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. M.N. Bostick,
President
KMTX Broadcasting Company
P.O. Box 7528
Waco, TX 76710

RE: MUR 1837

Dear Mr. Bostick:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074526O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

David M. McClanhan, Treasurer
Houston Industries Political
Action Committee
5 Post Oak Park
Houston, TX 77027

RE: MUR 1837

Dear Mr. McClanhan:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8900407432261

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

William E. Critzer, Treasurer
National Federation of Independent Business
Free Enterprise Political Action Committee
150 W. Twentieth Avenue
San Mateo, CA 94403

RE: MUR 1837

Dear Mr. Critzer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074526 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Martha Weisend, Treasurer
Texas Republican Congressional Committee
211 East 7th Street
Austin, TX 78701

RE: MUR 1837

Dear Ms. Weisend:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074532263

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Brian M. Meyer, Treasurer
American Bankers Association
1120 Connecticut Avenue, N.W.
Suite 851
Washington, D.C. 20036

RE: MUR 1837

Dear Mr. Meyer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble

Lawrence M. Noble
General Counsel

8904074326 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

A.J. Pate, Treasurer
Tenneco Inc. Employees
Good Government Fund
P.O. Box 2511
Houston, TX 77252

RE: MUR 1837

Dear Treasurer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8900745263

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Edmund S. Hawley, Treasurer
Union Pacific Fund
for Effective Government
345 Park Avenue, 31st Floor,
Suite 3100
New York, N.Y. 10154

RE: MUR 1837

Dear Mr. Hawley:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074526 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. H. Wendell Hobbs
Route 1, Box 590
McAllen, TX 78504

RE: MUR 1837

Dear Mr. Hobbs:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

3904074526 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Robert L. Wheelock, Jr.
P.O. Box 1239
Corsicana, TX 75110

RE: MUR 1837

Dear Mr. Wheelock:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

9904074526 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. H.B. Zachry, Jr.
7603 Shadylane
San Antonio, TX 78209

RE: MUR 1837

Dear Mrs. Zachry:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074526 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. B.S. Baker
8636 LaFonte
Houston, TX 77024

RE: MUR 1837

Dear Mr. Baker:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074527 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Ernest Bel Fay
2304 1st City National Bank
Houston, TX 77002

RE: MUR 1837

Dear Mr. Bel Fay:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

9904074527 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. P. Gill
P.O. Box 599
San Antonio, TX 78292

RE: MUR 1837

Dear Mr. Gill:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074527 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. George S. Hawn
101 North Shoreline
Corpus Christi, TX 78401

RE: MUR 1837

Dear Mr. Hawn:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2004074527 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Edith Huebner
P.O. Drawer 20350
San Antonio, TX 78286

RE: MUR 1837

Dear Mrs. Huebner:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074527 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 17, 1989

Mrs. H.L. Hunt
1401 InterFirst One
Dallas, TX 75202

RE: MUR 1837

Dear Mrs. Hunt:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8900745273

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Ray L. Hunt
1401 InterFirst One
Dallas, TX 75202

RE: MUR 1837

Dear Mr. Hunt:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074527 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Nancy A. Hunt
1401 InterFirst One
Dallas, TX 75202

RE: MUR 1837

Dear Mrs. Hunt:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074527 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. J.I. Jackson
3880 Halen Street
Suite 329
Ft. Worth, TX 76107

RE: MUR 1837

Dear Mr. Jackson:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

3204074552278

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Abe M. Katz
P.O. Box 1436
Corpus Christi, TX 78403

RE: MUR 1837

Dear Mr. Katz:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074527 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Frederick R. Meyer
5830 Averill Way
Dallas, TX 75225

RE: MUR 1837

Dear Mr. Meyer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074528 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mrs. Drayton McLane, Jr.
P.O. Box 927
Temple, TX 76501

RE: MUR 1837

Dear Mrs. McLane:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074528 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Robert L. Bradley
4200 Texas Commerce Tower
Houston, TX 77002

RE: MUR 1837

Dear Mr. Bradley:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074528 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Dr. R.A. Box
2604 Jarrett
Austin, TX 78703

RE: MUR 1837

Dear Dr. Box:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074328 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. Thomas M. Benson, Jr.
9400 San Pedro
San Antonio, TX 78216

RE: MUR 1837

Dear Mr. Benson:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074528 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1989

Mr. E.B. Bottom
1200 Elm
Mission, TX 78572

RE: MUR 1837

Dear Mr. Bottom:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904074529

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1837

DATE FILMED 4/25/97 CAMERA NO. 3

CAMERAMAN AS

9904074529

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE FILE IN

(Closed) MUR 1837

9900407518993

JAMES F. SCHOENER
XXXXXXXXXXXXXXXXXXXXXXXXXXXX
WASHINGTON, D.C. 20005
XXXXXXXXXXXXXXXXXXXX
203 Yoakum Pkwy I - 323
Alexandria, Virginia
22304

80 MAY 12 AM 10:20

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

Re: Friends of Phil Gramm MUR 1837

Dear Sir:

Enclosed please find receipts from twelve seperate charities (I am informed that all qualify under Section 170 (c) of title 26 of the United States Code) totaling $8,980.00. These gifts to these charities is made pursuant to paragraph VII (2) of the Conciliation Agreement signed in this matter. The sum is composed of 16 excessive contributions which cannot be refunded to the donor who is either deceased (without an open estate) or a person who cannot be located at or near the place shown at the time of donation.

Please acknowledge the performance of this provision of the agreement. I will inform you further when the other provisions are completed.

Please also advise if we may destroy the voluminous records the are over three years old that were the subject of the audit conducted in this matter.

Very truly yours,

James F. Schoener

James F. Schoener

cc. Don White

8204075189 4

I hereby acknowledge receipt of Check #6471 for $380.00
from Friends of Phil Gramm.

SIGNED: Bonnie Martin, Principal

Meredith Magnate School
Superintendent Marilyn Hoster
200 North 23rd Street
Temple, Texas 76501

We are grateful
for this generous
gift from Senator Gramm.
We will put this to
good use in helping
children achieve success
in education.

B. Martin

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds
to re-elect Phil Gramm to the United States Senate

8900407518965

I hereby acknowledge receipt of Check #6484 for $2,000.00 from Friends of Phil Gramm.

SIGNED: Wil S Miletta (EO)

Waialua United Church of Christ
P. O. Box 663
Waialua, Hawaii 96791

8 9 0 4 0 7 5 1 3 9 0

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds
to re-elect Phil Gramm to the United States Senate

I hereby acknowledge receipt of Check #6473 for $2,000.00 from Friends of Phil Gramm.

SIGNED: Mary-Earle Hanssen

Mary-Earle Hanssen
Director of Development

Georgetown Day School
4200 Davenport Street, N W.
Washington, D. C. 20016

8 0 0 4 0 7 5 1 8 9 7

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds to re-elect Phil Gramm to the United States Senate

I hereby acknowledge receipt of Check #6474 for $500.00 from Friends of Phil Gramm.

SIGNED: M Jane Eaves, Director of Development

Sheridan School
4400 36th Street, N. W.
Washington, D. C. 20008

9900751898

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds to re-elect Phil Gramm to the United States Senate

I hereby acknowledge receipt of Check #6475 for $500.00
from Friends of Phil Gramm.

SIGNED: Linda J. Van Sickle

University of Georgia
David McCord Wright Lecture Series Trust Fund
College of Business Administration
Department of Economics
147 Brooks Hall
Athens, Georgia 30602

80075189?

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds
to re-elect Phil Gramm to the United States Senate

Our thanks, Phil

I hereby acknowledge receipt of Check #6476 for $500.00
from Friends of Phil Gramm.

SIGNED: Rona A Funk

Brazos County United Way
P. O. Box 3802
Bryan, Texas 77805

X20040751300

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds
to re-elect Phil Gramm to the United States Senate

I hereby acknowledge receipt of Check #6477 for $1,000.00 from Friends of Phil Gramm.

SIGNED: Tylene Wright

TAMU Association of Former Students
P. O. Box 7368
College Station, Texas 77844

8 9 0 4 0 7 5 1 9 0 1

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds to re-elect Phil Gramm to the United States Senate

I hereby acknowledge receipt of Check #6479 for $500.00 from Friends of Phil Gramm.

SIGNED: Elizabeth Barnett

Bryan Boys Club
900 West W. J. Bryan Parkway
Bryan, Texas 77803

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds to re-elect Phil Gramm to the United States Senate

I hereby acknowledge receipt of Check #6503 for $500.00 from Friends of Phil Gramm.

SIGNED: Elizabeth Barnett

Bryan Boys Club
900 West W. J. Bryan Parkway
Bryan, Texas 77803

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds to re-elect Phil Gramm to the United States Senate

I hereby acknowledge receipt of Check #6481 for $500.00 from Friends of Phil Gramm.

SIGNED: Loraye I. White, MPA

Chief of Staff Services

Texas War on Drugs
11044 Research Blvd., Building D
Suite 2
Austin, Texas 78759

8204075190 4

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds to re-elect Phil Gramm to the United States Senate

I hereby acknowledge receipt of Check #6480 for $200.00 from Friends of Phil Gramm.

SIGNED: Grayson County Rehabilitation Center
for Children & Adults
Martha Dealey

Grayson County Rehabilitation Center for
Children and Adults, Inc.
1216 Hillcrest
Sherman, Texas 75090

32040751905

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds
to re-elect Phil Gramm to the United States Senate

I hereby acknowledge receipt of Check #6482 for $400.00 from Friends of Phil Gramm.

SIGNED: Claude Hicks
President. Thank you!

Hendrick Home for Children
P. O. Box 5195
Abilene, Texas 76908-5195

8 9 0 4 0 7 5 1 9 0 0

Paid for by the Friends of Phil Gramm
This is the only committee authorized to raise funds
to re-elect Phil Gramm to the United States Senate

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 1837 .

R 9 0 4 0 7 5 2 1 5 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 16, 1989

James F. Schoener, Esquire
Thompson & McMullan
1101 King Street
Suite 390
Alexandria, VA 22314

RE: MUR 1837 (closed case)
Friends of Phil Gramm and
Donald White, as treasurer

Dear Mr. Schoener:

This is in response to your inquiry regarding the Gramm Committee's responsibility to maintain certain documents and records generated as a result of the Commission's audit and investigation in the above-captioned matter. As you are aware, the Commission concluded its investigation with the approval of a conciliation agreement on April 11, 1989. Consequently, the maintenance of these records is governed by 2 U.S.C. § 432(d), requiring the preservation of all supporting records for three years after a report is filed. Thus, the Gramm Committee is not required by law to maintain supporting records for reports filed more than three years ago.

If you have any questions, please contact Patty Reilly at 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904075215 2

CLOSED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 26, 1989

Mr. Montana McKean
c/o McKean Properties
P.O. Box 1719
Seguin, TX 78155-8719

RE: MUR 1837
Friends of Phil Gramm

Dear Mr. McKean:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904075215 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 26, 1989

Mr. L.D. Burns
Route 2, Box 73
Wichita Falls, TX 76301

RE: MUR 1837
Friends of Phil Gramm

Dear Mr. Burns:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904075215 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 26, 1989

Mrs. Elga Rea
2701 W. 15th #623
Plano, TX 75075-7523

RE: MUR 1837
Friends of Phil Gramm

Dear Mrs. Rea:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904075215 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 26, 1989

Mr. R.R. Lowdon
550 Bailey Avenue, #304
Ft. Worth, TX 76107-2111

RE: MUR 1837
Friends of Phil Gramm

Dear Mr. Lowdon:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904075215 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 26, 1989

Mr. Donald M. Carlton
1355 The High Road
Austin, TX 78746

RE: MUR 1837
Friends of Phil Gramm

Dear Mr. Carlton

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

8904075157

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 26, 1989

Mr. Edward Rea
2701 W. 15th #623
Plano, TX 75075-7523

RE: MUR 1837
Friends of Phil Gramm

Dear Mr. Rea:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE

PUBLIC RECORD IN (CLOSED) MUR 1837

3704076997

OGC 3326

RECEIVED
FEDERAL ELECTION COMMISSION
ADMIN. REVIEW DIVISION

89 JUL -6 AM 11:29

THOMPSON & McMULLAN
1101 KING STREET, SUITE 390
ALEXANDRIA, VIRGINIA 22314

TELEPHONE (703) 684-2000
TELECOPIER (703) 684-5109
TELEX 265016 OTESUR

RICHMOND OFFICE
100 SHOCKOE SLIP
RICHMOND, VIRGINIA 23219
TELEPHONE (804) 649-7545
TELECOPIER (804) 780-1813

July 5, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

89 JUL -6 PM 1:24

Ms. Patty Reilly
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MVR 1837 (Closed Case)
Friends of Phil Gramm

Dear Ms. Reilly:

In accordance with the Conciliation Agreement entered into between my client, Friends of Phil Gramm and your Commission, we have requested refunding from the National Republican Senatorial Committee, the Texas Victory Fund '84 and the Republican Host Committee. The Senatorial Committee has paid the amount requested and such refund will be noted in the next reports filed with your Commission by each of these committees.

The Texas Victory Fund and the Host Committee are (as we had earlier suspected) both out of business with no funds. The attorney for Texas Republican Party has written by letter dated June 29, 1989 (a copy of which is attached) advising that no funds were available to respond to that request. Presumably, there would be little chance of reopening such committees and fund raise the requested amounts.

We, therefore, request that your Commission recognize that compliance with this provision is impossible and that you agree that we need not spend further efforts in pursuit of this obligation.

Very truly yours,

James F. Schoener

James F. Schoener
Of Counsel

JFS:am
Enclosure
cc: William Canfield, Esquire
Richard F. Smith
Don White

GARDERE & WYNNE
ATTORNEYS AND COUNSELORS

SUITE 1500
717 NORTH HARWOOD STREET
DALLAS, TEXAS 75201

214-979-4500

TELECOPIER 214-979-4667
CABLE: GARWYN
TELEX 73-0197

WRITER'S DIRECT DIAL NUMBER
214-979-4709

June 29, 1989

Mr. James F. Schoener
Thompson & McMullan
1101 King Street, Suite 390
Alexandria, VA 22314

Dear Mr. Schoener:

Fred Meyer has asked me to respond to your letter of June 21, 1989. In this letter, pursuant to a conciliation agreement entered into by Friends of Phil Gramm with the Federal Election Commission in MUR 1837, you requested that Texas Victory '84 Fund reimburse Friends of Phil Gramm in the amount of $2,899.07, and that the Republican Host Committee reimburse Friends of Phil Gramm in the amount of $5,270.88. As you may know, I currently serve as general counsel to the Republican Party of Texas (the organization that established Texas Victory '84), and in 1984 served as legal counsel to the Republican Host Committee.

The Texas Victory '84 Fund was a special purpose fund established and organized to assist in the election of Republican candidates for federal office in the 1984 general election. The Republican Host Committee was organized to provide services and assistance to delegates to the 1984 Republican presidential nominating convention held in Dallas in August 1984. These organizations have long since been disbanded and gone out of existence, and neither of them has any funds that might be used to satisfy obligations that it might have or to respond to requests for reimbursement such as yours. Thus, I regret to inform you that neither of these organizations is able to comply with your request for reimbursement.

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

Sincerely yours,

Richard F. Smith

Richard F. Smith

RFS/jw

cc: Mr. Fred Meyer

5915d