



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE END OF FILM # 2158

Date Filmed 11/18/76 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

M 2158

Routing Slips; Return Concurrence Docs;

Internal Procedures; Voting Sheets; 12

Day Report; Duplicate Documents

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

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☒ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☐ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

date

John K. Drury
9/29/86

REC 9-21-77

86040513995

SUMMARY FILE CHECK-OFF

KJR :

2158

9/19/86

Date of Close-out Letters (Mail:..)

CONTENT CHECK-OFF

- ☒ Close-Out Letter(s)
- ☒ Final OGC Report or Memorandum or Conciliation Agreement(s)
- ☐ NA Respondent(s) Reply to Brief(s)
- ☐ NA General Counsel's Brief(s)
- ☒ Respondent's Reply to RTS Finding
- ☒ First General Counsel's Report
- ☐ NA Respondent's Reply to the Complaint
- ☐ NA Original Complaint(s) (If Any)
- ☐ NA Other Report or Correspondence*
- ☒ All Certifications**

John Drury Preparer of the Summary File

Date 9/29/86 File Reviewed by L. P. [Signature]

* To be included if, in the opinion of the staff member, it is important.

** Certifications of Commission actions should be placed in the Summary File prior to the documents which formed the basis of the action and in reverse chronological order.

(Revised 7/5/83)

86040513996

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Nowlin Savings/Nowlin Mortgage
Political Action Committee, and
B. Larry Johnson, Treasurer

MUR 2158

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 16, 1986, the Commission decided by a vote of 5-0 to take the following actions in MUR 2158:

1. Approve the conciliation agreement with Nowlin Savings/Nowlin Mortgage Political Action Committee and B. Larry Johnson, treasurer, as recommended in the General Counsel's Report signed September 11, 1986.
2. Approve the letter, as recommended in the General Counsel's Report signed September 11, 1986.
3. Close the file.

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

Attest:

9-16-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Thurs.,	9-11-86,	3:23
Circulated on 48 hour tally basis:	Fri.,	9-12-86,	2:00
Deadline for vote:	Tues.,	9-16-86,	4:00

86040613997



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 19, 1986

Janice Schattman, Esquire
201 Main Street, Suite 2500
Fort Worth, Texas 76102

RE: MUR 2158
Nowlin Savings/Nowlin
Mortgage Political Action
Committee
B. Larry Johnson, Treasurer

Dear Ms. Schattman:

On September 16, 1986, the Commission accepted the conciliation agreement signed by your client and a civil penalty in settlement of a violation of 11 C.F.R. § 102.5(a), a provision of the Regulations promulgated under the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: *Lawrence M. Noble* (with)
Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

86040613998

KELLY, APPLEMAN, HART & HALLMAN
ATTORNEYS AT LAW
2200 FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102
(817) 338-2200

6CC#1270
26 AUG 13 49:50
FEB.

August 13, 1986

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

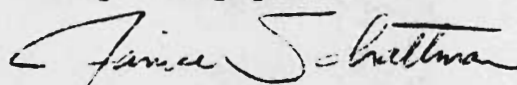
RE: MUR 2156; Nowlin Savings/Nowlin Mortgage
Political Action Committee (NOWPAC)

Dear Mr. Drury:

Enclosed is the original of the Conciliation Agreement proposed by the Commission that has been executed by NOWPAC, together with a check in the amount of \$200.00 payable to the Treasurer of the United States. Please send me a copy of the Agreement after it is executed by the Commission.

I greatly appreciate the professional and courteous manner in which you have handled this matter. If anything in addition is necessary to close this inquiry, please let me know.

Very truly yours,



Janice A. Schattman

JAS:ds
Enclosure

Attachment II Page 1.

86040613999

16 AUG 20 40:00

GENERAL COUNCIL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Nowlin Savings/Nowlin Mortgage
Political Action Committee; and

B. Larry Johnson, Treasurer

MUR 2158

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Nowlin Savings/Nowlin Mortgage Political Action Committee; and B. Larry Johnson, as treasurer ("Respondents"), violated 11 C.F.R. § 102.5(a) by failing to obtain written authorization to transfer funds from its non-federal account to its federal account prior to such transfer.

NOW, THEREFORE, the Commission and 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. Respondents enter voluntarily into this agreement with the Commission.

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

1. Respondent Nowlin Savings/Nowlin Mortgage Political Action Committee, (hereinafter NOWPAC or "the Committee"), is a political committee within the meaning of 2 U.S.C. § 431(4).
2. Respondent B. Larry Johnson is the treasurer of NOWPAC.
3. Respondents transferred funds from the non-federal account to the federal account without first obtaining written authorizations from the contributors involved stating their intent to make a contribution to the federal account.

V. Respondents failed to obtain written authorizations from contributors prior to transferring funds from a non-federal account to a federal account, in violation of 11 C.F.R. § 102.5(a).

VI. Respondents 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).

VII. 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.

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

IX. 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.

X. 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 M. Steele
General Counsel

BY: Lawrence M. Noble (at)
Lawrence M. Noble
Deputy General Counsel

9/18/86
Date

FOR THE RESPONDENTS:

B. Larry Johnson
B. Larry Johnson
Treasurer

8-11-86
Date

3891

86040514002

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY

In the Matter of

Nowlin Savings/Nowlin Mortgage
Political Action Committee; and
B. Larry Johnson, Treasurer

NUR 2150

SEP 11 P3:23

GENERAL COUNSEL'S REPORT

Background

Attached is a conciliation agreement which has been signed by counsel for the respondent.

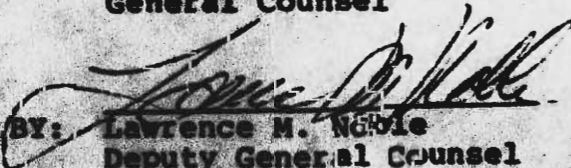
Recommendation

1. Approve the attached conciliation agreement with Nowlin Savings/Nowlin Mortgage Political Action Committee and B. Larry Johnson, treasurer.
2. Approve the attached letter.
3. Close the file.

Charles N. Steele
General Counsel

Date

9/11/81

BY: 
Lawrence M. Noble
Deputy General Counsel

Attachments

Conciliation Agreement
Copy of Respondent's Letter and Civil Penalty Check
Proposed Letter

86040614003

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Nowlin Savings/Nowlin Mortgage
Political Action Committee;
B. Larry Johnson, Treasurer

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)
MUR 2158

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 29, 1986, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 2158:

1. Enter into conciliation with the Nowlin Savings/Nowlin Mortgage Political Action Committee and B. Larry Johnson, treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement attached to the General Counsel's report dated July 17, 1986, subject to amendment of the agreement to reduce the civil penalty to Two Hundred Dollars (\$200.00).
3. Approve the letter attached to the General Counsel's report dated July 17, 1986.

Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision; Commissioners Harris and McDonald dissented.

Attest:

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





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 1, 1986

Janice A. Schattman
201 Main Street
Suite 2500B
Fort Worth, TX 76102

RE: MUR 2158
Nowlin Savings/Nowlin
Mortgage Political
Action Committee, and
B. Larry Johnson,
Treasurer

Dear Ms. Schattman:

On March 27, 1986, the Commission found reason to believe that your clients violated 11 C.F.R. § 102.5(a). At your request, the Commission determined on July 29, 1986, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

Lawrence M. Noble
By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

86040514005

BEFORE THE FEDERAL ELECTION COMMISSION

CONFIDENTIAL

In the Matter of

Howlin Savings/Howlin Mortgage
Political Action Committee; and

NUR 2158

B. Larry Johnson, Treasurer

GENERAL COUNSEL'S REPORT

On March 27, 1986, the Commission found reason to believe that the Howlin Savings/Howlin Mortgage Political Action Committee and B. Larry Johnson, treasurer, ("respondents") had violated 11 C.F.R. § 102.5(a) by transferring funds from the Committee's non-federal account into its federal account. On April 21, this Office received a letter from the respondents requesting that the matter be processed through pre-probable cause conciliation. In addition, the respondents requested an extension of time in which to respond to the reason to believe notification. (See Attachment I).

II. LEGAL ANALYSIS

This response arrived at the Commission on May 16. It includes an affidavit by B. Larry Johnson, supporting documentation, and a collection of authorization statements signed by those who contributed the money transferred to the federal account. These statements are dated April 15, 1986. (See Attachment II).

In Advisory Opinion 1984-31, the Commission addressed a similar set of facts. As in this matter, a bank proposed to move funds from its political committee's non-federal account to an account subject to the limitations and prohibitions of the Act. Additionally, as in the present case, all of the funds involved

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had been contributed voluntarily by directors and officers of the bank.

The Commission concluded that the bank could move funds into its federal account provided that it first obtain from the contributors statements indicating their intent to make a contribution to the federal account. (See Attachment III).

In this case, the transfer occurred in 1984. The respondents obtained written authorizations in April, 1986. Therefore, the written authorizations were not obtained prior to the transfer, and hence, the respondents are in violation of § 102.5(a).

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATION

1. Enter into conciliation with the Nowlin Savings/Nowlin Mortgage Political Action Committee and B. Larry Johnson, treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement.

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3. Approve the attached letter.

Charles W. Steele
General Counsel

Date

7/17/86

BY:

Lawrence M. Noble
Deputy General Counsel

Attachments

1. Request for Pre-Probable Cause Conciliation
2. Response to RTB Notification
3. Advisory Opinion 1984 - 31
4. Proposed Conciliation Agreement
5. Proposed Letter to Respondents

86040614008

KELLY, APPLEMAN, HART & HALLMAN
ATTORNEYS AT LAW
2500 FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102
(817) 338-2500

WRITER'S DIRECT DIAL NUMBER

(817) 878-3514

RECEIVED AT THE FEC
HAND DELIVERED
86 MAY 16 410:33

TELECOPIER
(817) 338-2500

May 15, 1986

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

RE: MUR 2158; Nowlin Savings/Nowlin Mortgage
Political Action Committee (NOWPAC)

Dear Mr. Drury:

Enclosed is a factual response to the above-referenced inquiry. This response consists of an Affidavit by Mr. B. Larry Johnson, individually and as Treasurer of NOWPAC, together with various attachments described in the affidavit.

I greatly appreciate your courtesy in handling this matter. If this response is not adequate for your purposes, please let me know immediately and I will obtain any additional material as soon as possible.

Very truly yours,

Janice A. Schattman
Janice A. Schattman

JAS/ds

Enclosure

248233/1193h

86 MAY 16 4:33:22

GENERAL COUNSEL

86040314009

AFFIDAVIT

STATE OF TEXAS :

COUNTY OF TARRANT :

BEFORE ME, the undersigned authority, on this day personally appeared B. Larry Johnson, Treasurer of NOWPAC, known to me to be the person and officer whose name is subscribed hereto, and having first been duly sworn by me upon oath deposed and said:

1. My name is B. Larry Johnson, I became the Treasurer of Nowlin Savings/Nowlin Mortgage Political Action Committee (now NOWPAC), on or about _____. I am fully authorized to make this affidavit on its behalf. I am over the age of 18 years and have personal knowledge of the facts contained in this affidavit.

2. Prior to 1984, Nowlin Savings Association and Nowlin Mortgage Company had two separate PACs, one for state purposes and one for federal purposes. The members of these PACs were the officers and directors of the two companies.

3. In late March, 1984, I learned that it was possible to operate a combined federal and state PAC. I contacted legal counsel for the Mortgage Banker's Association in Washington, D.C., for advice on how to carry out such a merger and how to operate and correctly report on a consolidated basis. The attorney to whom I was referred told me that he would contact the Federal Election Commission for guidance. He subsequently called and advised me that he had spoken with the FEC and told me what to do in order to consolidate the two existing PACs. He told me that we should transfer the funds held in NOWPAC, the state PAC, into national NOWPAC, the existing federal PAC. We were then to change the name from national NOWPAC to NOWPAC. Attached is a statement dated October 18, 1984, that accompanied the next quarterly report to the FEC reflecting the change. (Ex. 1)

5. All current members of the committee were informed of the change immediately or at the next meeting of the Board. Counsel for the NBA did not advise me that it was necessary to obtain written consents to use the state funds for federal purposes.

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6. In early May, 1985, I received your letter dated May 8th requesting verification of the transfers into the consolidated account. A copy of my response to that inquiry is attached. (Ex. 2) In July, 1985, I spoke with Mr. Hunter Bryan by phone regarding additional information that was needed. By letter dated July 22, 1985, a copy of which is attached, I provided Mr. Brian with all of the information that he requested. (Ex. 3) Up to that time, there had still been no mention of the need for written consents from the committee members.

7. All committee members actually consented to the consolidation of the two committee in all respects, including giving permission to use funds originally contributed to the state PAC for federal purposes. Attached are consent forms from all of the contributors to NOWPAC from April 1983 through June 20, 1984 verifying that they consented to the consolidation. We were not able to obtain consents from Allen Jones, M.L. Maciejewski, John E. Driscoll, Sr., and Kenneth Garrett. With the exception of Kenneth Garret, the three individuals who did not sign written consents are either deceased or their whereabouts are unknown. Mr. Kenneth Garrett will provide a written consent on Monday, May 19, 1986, which will be forwarded to the FEC immediately by Federal Express. (Ex. 4)

8. All contributions made to the state PAC by a person who has not yet signed a consent, including those made by Mr. Kenneth Garrett, have been deposited in a separate account entitled NOWPAC-State Account and will be used for state and local purposes only, unless and until the individuals making the contributions give a written consent to transfer the funds to the federal account. (Ex. 5)

9. In the future, all new members will be asked to sign a certificate authorizing NOWPAC to use all contributions for local, state, or national elections, in the form that is attached. (Ex. 6)

10. The consolidation of these PACs was done only to ease the administrative burden involved in maintaining two accounts and was done with the actual knowledge and permission of all members. All reports have fully disclosed the fact of the transfer, the source, and the actual use of all funds. In doing so, NOWPAC and myself were acting under the advice of counsel with

the full intent to comply with all federal law and regulations concerning federal PACs.

Further affiant sayeth not.

B. Larry Johnson
B. Larry Johnson, Individually
and as Treasurer for NOWPAC

SUBSCRIBED AND SWORN TO before me this 15th day of May, 1986, to certify which witness my hand and seal of office.

Diana Salinas
Notary Public in and for State of Texas

My commission expires: 3-18-90

1192h

86040614012

NOWLIN SAVINGS

NOWPAC
(Formerly NATIONAL NOWPAC)
2821 Lockland Road
P. O. Box 390
Fort Worth, Texas 76101

October 18, 1984

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

To Whom It May Concern:

Before June 18, 1984, there existed two PACs with the above address:

<u>Name</u>	<u>Type</u>	<u>Regulator</u>
o National NOWPAC	PAC for Federal Elections	Federal Election Commission
o NOWPAC	PAC for Local & State (Texas) Elections	Secretary of State State of Texas

On June 18, 1984, NOWPAC was merged into National NOWPAC. The name of National NOWPAC was changed to NOWPAC. The merged NOWPAC will continue to make contributions to candidates for Federal, State and Local campaigns. The details of such activities will be reported to the appropriate regulators in accordance with their rules and regulations.


B. Larry Johnson
Treasurer
NOWPAC

86040514013

bcc: Wade T. Nowlin

NOWLIN SAVINGS

June 4, 1985

Mr. J. Hunter Bryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Identification Number: C00169219

Dear Mr. Bryan:

Your letter of May 8, 1985 requested clarification of transfers into the "National Nowpac" account from the "Nowpac" account on the following dates and in the amounts indicated:

10-11-83	\$ 1,000.00
3-13-84	3,000.00
6-18-84	10,950.00

In early 1983, Nowlin Savings Association and Nowlin Mortgage Company established two PAC's. NONPAC was to be used for state and local purposes; NATIONAL NONPAC was to be used for national purposes. These PAC's were funded by the directors and officers of the above two companies.

In June 1984, it was decided to consolidate the two PAC's and from then on, report to the FEC and the Secretary of State of Texas. Attached is a copy of a letter we forwarded in this regard.

On May 21, 198⁵, we discussed this matter and you requested that we forward a detailed listing of the contributors to the PAC's from its inception in early 1983 to the merger date on June 20, 1984. Attached is this listing that shows the contributor, date and amount. As previously stated, all named individuals were either officers or directors of Nowlin Savings Association or Nowlin Mortgage Company.

If you have any further questions or desire any additional information, please contact me (817-735-0715).

Sincerely yours,

B. Larry Johnson
B. Larry Johnson
Treasurer, NONPAC

BLJ/cs

Enclosures

86040614015

NOWLIN SAVINGS

NOWPAC
(Formerly NATIONAL NOWPAC)
2821 Lockland Road
P. O. Box 350
Fort Worth, Texas 76101

October 18, 1984

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

To Whom It May Concern:

Before June 18, 1984, there existed two PACs with the above address:

<u>Name</u>	<u>Type</u>	<u>Regulator</u>
o National NOWPAC	PAC for Federal Elections	Federal Election Commission
o NOWPAC	PAC for Local & State (Texas) Elections	Secretary of State State of Texas

On June 18, 1984, NOWPAC was merged into National NOWPAC. The name of National NOWPAC was changed to NOWPAC. The merged NOWPAC will continue to make contributions to candidates for Federal, State and Local campaigns. The details of such activities will be reported to the appropriate regulators in accordance with their rules and regulations.


B. Larry Johnson
Treasurer
NOWPAC

86040614016

PS Form 3827, July 1982

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will be charged to you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for service(s) requested.

1. ☐ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
**FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C. 20463**

4. Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail
Article Number: **P654076952**

Always obtain signature of addressee at delivery and
DATE DELIVERED

5. Signature - Addressee
X

6. Signature - Agent
X

7. Date of Delivery: **8/10/84**

8. Addressee's Address (ONLY if requested and for field)

RECEIVED AT THE FEC

PS Form 3827, Feb. 1982

P 654 076 952

RECEIPT FOR CERTIFIED MAIL

**NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL**

(See Reverse)

Sent to: **FEDERAL ELECTION COMMISSION**

Street and No.: **1325 K ST. N.W.**

P.O., State and ZIP Code: **WASHINGTON, D.C. 20463**

Postage: **8**

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing to whom and Date Delivered

Return receipt showing to whom, Date, and Address of Delivery

TOTAL Postage and Fees: **8**

Postmark or Date

86040414017

NDA IN SAVINGS/NDA IN MORTGAGE
POLITICAL ACTION COMMITTEE

RECEIPTS—1983

<u>Date</u>	<u>Name</u>	<u>Amount</u>
4/4	✓ H. C. Wood	\$ 500
4/20	✓ Wales Hadden, Jr.	500
4/25	✓ James F. Beckman	500
4/28	✓ Sam R. Day	500
4/29	✓ Jack York	500
5/4	✓ G. Jack Wiley	500
5/5	✓ Wade T. Nowlin	2,000
5/24	✓ Georgia Hill	1,000
	✓ Susan Ferreira	1,000
	✓ Phillip Askew	600
5/25	— Lonny Coffey	350 —
6/1	✓ H. Rob Frenzel	50
6/2	✓ John Smith	1,000
	✓ William Eikenberry	150
6/8	✓ Martin Morgan	700
6/28	— John E. Driecoll, Sr.	250 —
	— Jim Witherow	300 —
7/5	✓ J. Ray Taylor	500
7/26	— Allen Jones	250 —
8/1	— M. L. Maciejewski	300 —
8/24	× H. Rob Frenzel	100
8/25	× G. Jack Wiley	500
8/27	× H. C. Wood	500
9/6	✓ Kenneth Garrett	500
10/17	× H. Rob Frenzel	50
11/3	× H. C. Wood	500
11/4	× William Eikenberry	100
12/2	× G. Jack Wiley	500
12/19	× H. Rob Frenzel	100
12/30	× H. Rob Frenzel	50
	Total--1983	\$14,350

RECEIPTS—1984

3/26	✓ Wade T. Nowlin	2,000
3/28	✓ G. Jack Wiley	500
4/3	✓ Richard Driecoll	500
5/10	✓ Phillip Askew	650
	✓ James F. Beckman	500
	— Lonny Coffey	375 —

86040614018

NON-PAID SAVINGS/PAID IN MORTGAGE
POLITICAL ACTION COMMITTEE

RECEIPTS--1984 (cont'd)

Date	Name	Amount
5/10	✓ Sam R. Day	\$ 500
	✓ William Eikenberry	300
	✓ Susan Ferreira	1,500
	✓ H. Rob Frenzel	500
	✓ Kenneth Garrett	500
	✓ Georgia Hill	650
	✓ B. Larry Johnson	400
	✓ Allen Jones	400
	✓ Wales H. Madden, Jr.	500
	✓ Martin Morgan	700
	✓ Wade Nowlin, Jr.	500
	✓ Douglass M. Porter	750
	✓ John Smith	750
	✓ J. Ray Taylor	500
	✓ G. Jack Wiley	500
	✓ Jack York	500
5/25	✓ John E. Driecoll, Jr.	250
6/18	Deposit from National NOWPAC (to close account)	300
	Total--1984 (to 6/20/84)	\$14,325
	Total--1983	\$14,350
	Total--1984 (to 6/20/84)	<u>14,325</u>
	Total--1983 & 1984	\$28,675
	Less Various Contributions-- (PACs, State, Federal, Local)	
	1983 \$ 9,275	
	1984 <u>8,450</u>	<u>\$17,725</u>
	Balance--6/20/84	<u>\$10,950</u>

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

B. Larry Johnson
B. Larry Johnson
Treasurer

6-5-85
Date

86040614019

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 4 for
LINE NUMBER
(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)

A. Full Name, Mailing Address and ZIP Code Wade T. Nowlin 510 Hazlewood Fort Worth, TX 76107	Name of Employer Nowlin Savings Assn. Nowlin Mortgage Co.	Date (month, day, year) 3/26/84	Amount of Each Receipt This Period 2,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Chairman	Aggregate Year-to-Date—\$ 2,000.00	
B. Full Name, Mailing Address and ZIP Code G. Jack Wiley 705 Chaffee Ct. Arlington, TX 76011	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 3/28 5/10	Amount of Each Receipt This Period 500.00 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Executive Vice President	Aggregate Year-to-Date—\$ 1,000.00	
C. Full Name, Mailing Address and ZIP Code Richard Driscoll 12 Greenwood Lane Roanoke, TX 76262	Name of Employer Nowlin Savings Assn. Nowlin Mortgage Co.	Date (month, day, year) 4/3/84	Amount of Each Receipt This Period 300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation VP & Controller	Aggregate Year-to-Date—\$ 300.00	
D. Full Name, Mailing Address and ZIP Code Phillip Askew 4859 Forest Lane Dallas, TX 75234	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 650.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President	Aggregate Year-to-Date—\$ 650.00	
E. Full Name, Mailing Address and ZIP Code James F. Beckman 1901 Indian Creek Dr. Fort Worth, TX 76107	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director	Aggregate Year-to-Date—\$ 500.00	
F. Full Name, Mailing Address and ZIP Code Lonny Coffey 4723 Anchorage Arlington, TX 76016	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 375.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President	Aggregate Year-to-Date—\$ 375.00	
G. Full Name, Mailing Address and ZIP Code Sam R. Day 2309 Medford Ct. E Fort Worth, TX 76109	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director	Aggregate Year-to-Date—\$ 500.00	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

06040514020

SCHEDULE A

ITEMIZED RECEIPT

LINE NUMBER
(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)

A. Full Name, Mailing Address and ZIP Code William Eikenberry 2625 Cockrell Fort Worth, TX 76109 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Vice President Aggregate Year-to-Date—\$ 300.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 300.
B. Full Name, Mailing Address and ZIP Code Susan Ferreira 5990 Lindenshire Dallas, TX 75230 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Sr. VP Aggregate Year-to-Date—\$	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 1,500
C. Full Name, Mailing Address and ZIP Code H. Rob Frenzel 7010 Lake Louise Arlington, TX 76016 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Nowlin Savings Assn. Occupation Sr. VP Aggregate Year-to-Date—\$ 500.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
D. Full Name, Mailing Address and ZIP Code Kenneth Garrett 4900 Westridge Ave. Fort Worth, TX 76116 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Director Aggregate Year-to-Date—\$ 500.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
E. Full Name, Mailing Address and ZIP Code Georgia Hill 4216 Rickover Dr. Dallas, TX 75244 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Vice President Aggregate Year-to-Date—\$ 650.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 650.00
F. Full Name, Mailing Address and ZIP Code B. Larry Johnson 6909 Serrano Dr. Fort Worth, TX 76126 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Vice President Aggregate Year-to-Date—\$ 400.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 400.00
G. Full Name, Mailing Address and ZIP Code Allen Jones Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Vice President Aggregate Year-to-Date—\$ 400.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 400.00
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

86040514021

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 2 of 4 for
 (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)

A. Full Name, Mailing Address and ZIP Code Wales Madden, Jr. 2701 Tickla Amarillo, TX 79106	Name of Employer Nowlin Savings Assn	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director	Aggregate Year-to-Date—\$ 500.00	
B. Full Name, Mailing Address and ZIP Code Martin Morgan 5722 Over Downs Dr Dallas, TX 75230	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 700.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President	Aggregate Year-to-Date—\$ 700.00	
C. Full Name, Mailing Address and ZIP Code Wade Nowlin, Jr. 6803 Kenwood Dallas, TX 75214	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director	Aggregate Year-to-Date—\$ 500.00	
D. Full Name, Mailing Address and ZIP Code Douglass M. Porter 3816 Hickory Springs Rd Fort Worth, TX 76116	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 750.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation President	Aggregate Year-to-Date—\$ 750.00	
E. Full Name, Mailing Address and ZIP Code John Smith 108 Ricky Lane Burleson, TX 76028	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 750.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Sr. VP	Aggregate Year-to-Date—\$ 750.00	
F. Full Name, Mailing Address and ZIP Code J. Ray Taylor 3695 Encanto Fort Worth, TX 76109	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director	Aggregate Year-to-Date—\$ 500.00	
G. Full Name, Mailing Address and ZIP Code Jack York 3424 Hilldale Rd. Fort Worth, TX 76107	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director	Aggregate Year-to-Date—\$ 500.00	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

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SCHEDULE A

ITEMIZED RECEIPT

LINE NUMBER
(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)

A. Full Name, Mailing Address and ZIP Code John E. Driscoll, Jr. (deceased) 4716 Twinpost Rd Dallas, TX 75234		Name of Employer Nowlin Savings Assn.	Date (month, day, year) 5/25/84	Amount of Each Receipt This Period 250.
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Occupation Vice President & Secretary		Aggregate Year-to-Date—\$ 250.00
B. Full Name, Mailing Address and ZIP Code Deposit from National NOWPAC to close account		Name of Employer	Date (month, day, year) 6/18	Amount of Each Receipt This Period 300.00
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)				14,325.00

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SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 3 for
LINE NUMBER
 (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)

A. Full Name, Mailing Address and ZIP Code H. C. Wood 6805 River Bend Fort Worth, TX 76132	Name of Employer Nowlin Savings Assn/ Nowlin Mortgage Co.	Date (month, day, year) 4/4/83 8/27/83 11/3/83	Amount of Each Receipt this Period 500.00 500.00 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation President		Aggregate Year-to-Date—\$ 1,500.00
B. Full Name, Mailing Address and ZIP Code Wales Madden, Jr. 2701 Tickla Amarillo, TX 79106	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 4/20/83	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director		Aggregate Year-to-Date—\$ 500.00
C. Full Name, Mailing Address and ZIP Code James F. Beckman 1901 Indian Creed Dr. Fort Worth, TX 76107	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 4/25/83	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director		Aggregate Year-to-Date—\$ 500.00
D. Full Name, Mailing Address and ZIP Code Sam R. Day 2309 Medford Ct. E Fort Worth, TX 76109	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 4/28/83	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director		Aggregate Year-to-Date—\$ 500.00
E. Full Name, Mailing Address and ZIP Code Jack H. York 3424 Hilldale Fort Worth, TX 76107	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 4/29/83	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director		Aggregate Year-to-Date—\$ 500.00
F. Full Name, Mailing Address and ZIP Code G. Jack Wiley 705 Chaffee Ct Arlington, TX 76011	Name of Employer Nowlin Mortgage Company	Date (month, day, year) 5/4/83	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Executive VP		Aggregate Year-to-Date—\$ 1,500.00
G. Full Name, Mailing Address and ZIP Code Wade T. Nowlin 510 Hazlewood Fort Worth, TX 76107	Name of Employer Nowlin Savings Assn. Nowlin Mortgage Co.	Date (month, day, year) 5/5/83	Amount of Each Receipt This Period 2,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Chairman		Aggregate Year-to-Date—\$ 2,000.00
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

86040614024

SCHEDULE A

ITEMIZED RECEIPTS

Page 5 of 3 for
 LINE NUMBER _____
 (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)

A. Full Name, Mailing Address and ZIP Code Georgia B. Hill 4216 Rickover Dr. Dallas, TX 75244 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Vice President Aggregate Year-to-Date—\$ 1,000.00	Date (month, day, year) 5/24/83	Amount of Each Receipt This Period 1,000.
B. Full Name, Mailing Address and ZIP Code Susan Ferreira 5990 Lindenshire Dallas, TX 75230 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Senior Vice President Aggregate Year-to-Date—\$ 1,000.00	Date (month, day, year) 5/24/83	Amount of Each Receipt This Period 1,000.00
C. Full Name, Mailing Address and ZIP Code Phillip Askew 4859 Forest Lane Dallas, TX 75234 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Vice President Aggregate Year-to-Date—\$ 600.00	Date (month, day, year) 5/24/83	Amount of Each Receipt This Period 600.00
D. Full Name, Mailing Address and ZIP Code Lonny Coffey 4723 Anchorage Arlington, TX 76016 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Vice President Aggregate Year-to-Date—\$ 350.00	Date (month, day, year) 5/25/83	Amount of Each Receipt This Period 350.00
E. Full Name, Mailing Address and ZIP Code H. Rob Prenzler 7010 Lake Louise Arlington, TX 76016 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn Nowlin Mortgage Co. Occupation Senior Vice President Aggregate Year-to-Date—\$ 350.00	Date (month, day, year) 6/1/83 8/24/83 10/17/83 12/19/83 12/30/83	Amount of Each Receipt This Period 50.00 100.00 50.00 100.00 50.00
F. Full Name, Mailing Address and ZIP Code John Smith 108 Ricky Lane Burleson, TX 76028 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Senior Vice President Aggregate Year-to-Date—\$ 1,000.00	Date (month, day, year) 6/2/83	Amount of Each Receipt This Period 1,000.00
G. Full Name, Mailing Address and ZIP Code William Eikenberry 2625 Cockrell Fort Worth, TX 76109 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Vice President Aggregate Year-to-Date—\$ 258.00	Date (month, day, year) 6/2/83 11/4/83	Amount of Each Receipt This Period 150.00 100.00
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (fill page this line number only)			

86040614025

SCHEDULE A

ITEMIZED RECEIPTS

Page 3 of 3 for
LINE NUMBER _____
 (Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code Martin Morgan 5722 Over Downs Dr Dallas, TX 75230	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 6/8/83	Amount of Each Receipt This Period 700.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Nowlin Mortgage Co. Aggregate Year-to-Date—\$ 700.00		
B. Full Name, Mailing Address and ZIP Code John E. Driscoll, Jr. (Deceased) 4716 Twinpost Rd Dallas, TX 75234	Name of Employer Nowlin Savings Assn. Nowlin Mortgage Co.	Date (month, day, year) 6/28/83	Amount of Each Receipt This Period 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President/Secretary Aggregate Year-to-Date—\$ 250.00		
C. Full Name, Mailing Address and ZIP Code J. Ray Taylor 3695 Encanto Fort Worth, TX 76109	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 7/5/83	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director Aggregate Year-to-Date—\$ 500.00		
D. Full Name, Mailing Address and ZIP Code Allen Jones P O Box 65001 Denver, CO 80206	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 7/26/83	Amount of Each Receipt This Period 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President Aggregate Year-to-Date—\$ 250.00		
E. Full Name, Mailing Address and ZIP Code M. L. Maciejewski 8111 Schaffer Houston, TX 77070	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 8/1/83	Amount of Each Receipt This Period 300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President Aggregate Year-to-Date—\$ 300.00		
F. Full Name, Mailing Address and ZIP Code Kenneth Garrett 4900 Westridge Ave Fort Worth, TX 76116	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 9/6/83	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director Aggregate Year-to-Date—\$ 500.00		
G. Full Name, Mailing Address and ZIP Code Jim Witherow 1507 ElCamino Real Apt. 118B Eules, TX 76039	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 6/28/83	Amount of Each Receipt This Period 300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President Aggregate Year-to-Date—\$ 300.00		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			14,350.00

86040514026

NOWLIN SAVINGS

July 22, 1985

Mr. J. Hunter Bryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K. Street, N.W.
Washington, D. C. 20463

Now PAC
File

Dear Mr. Bryan:

Per our conversation, enclosed are annual Schedule A's for 1983 and the period ended June 20, 1984 when the funds were combined. Refer to my letter of June 4, 1985 for a detailed description of this merging of PAC bank accounts.

Also enclosed is a Certified Resolution of Nowlin Savings Association Board Meetings on April 18, 1984 that authorized management to combine the accounts.

As I had previously indicated, we solicit contributions only from senior officers and directors. All of these are also shareholders. At each shareholders' annual meeting (held in April each year) it is the practice of the Chairman of the Board to review the activity of the PAC with the shareholders. This review would disclose the beginning balance of the PAC, receipts for the year, a detailed description of who contributions were made to (i.e., name, office seeking, state or federal), aggregate disbursements and ending balance.

As I have indicated, the sole purpose of combining the PACs was to ease the administrative burden. We fully intended and have reported all receipts and disbursements (whether state or federal), to both the Secretary of the State of Texas and the Federal Elections Commissions. However, we totally overlooked the source of the Funds transferred on June 20, 1984. I hope with my letter of June 4, 1985 and this, we have corrected this oversight.

If you need any additional information, do not hesitate to contact me.

Sincerely yours,

B. Larry Johnson

B. Larry Johnson
Treasurer

Nowlin Mortgage/Nowlin Savings PAC

bcc: Mr. Wade T. Nowlin

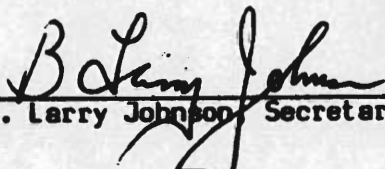
86040614027

CERTIFICATION OF CORPORATE RESOLUTION

I, B. Larry Johnson, being the duly constituted Executive Vice President and Secretary of Nowlin Savings Association, a corporation organized and existing under and by virtue of the laws of the State of Texas (hereinafter called this corporation), do hereby certify that the following is a true and complete copy of a Resolution duly adopted at the meeting of the Board of Directors of this corporation duly called and held on April 18, 1984, at which a quorum was present and voting; that said Resolution is still in full force and effect and has not been rescinded; and that said Resolution is not in conflict with the Charter or Bylaws of this corporation:

RESOLVED, That the Board of Directors of the Company authorize management to combine the Federal PAC and the State PAC and to make appropriate filings with the Federal Elections Commission and the Secretary of the State of Texas.

IN WITNESS WHEREOF I HAVE HEREUNTO SET MY HAND AND THE SEAL OF THIS CORPORATION THIS 1ST DAY OF JULY, 1985

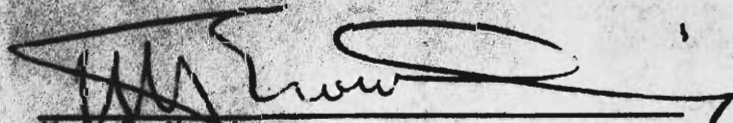

B. Larry Johnson Secretary

86040614028

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.


Wade T. Nowlin

86040614029

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.


James F. Beckman

86040614030

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.


J. Ray Taylor

86040614031

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.



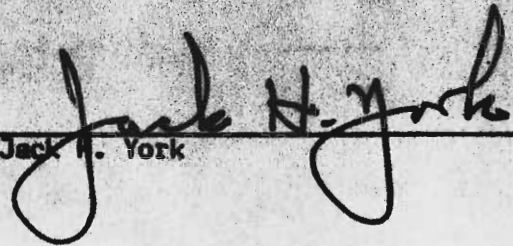
Sam R. Day

86040614032

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.


Jack H. York

86040514033

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.


Wade T. Nowlin, Jr.

86040614034

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.

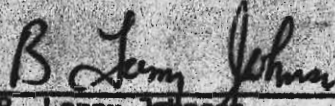
Walter Madden Jr.
Walter Madden, Jr.

86040614035

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.


B. Larry Johnson

86040614036

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.


Douglas M. Porter

86040614037

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.


Georgia Hill

86040614038

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.


John D. Smith

86040614039

NOWLIN SAVINGS

April 15, 1986

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Susan Ferreira

86040514040

NOWLIN SAVINGS

April 15, 1986

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Martin Morgan

86040514041

NOWLIN SAVINGS

April 15, 1986

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William Eikenberry

86040514042

NOWLIN SAVINGS

April 15, 1986

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Richard J. Driscoll

86040514043

NOWLIN SAVINGS

April 15, 1986

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H. Robert Frenzel

86040614044

NOWLIN SAVINGS

April 15, 1986

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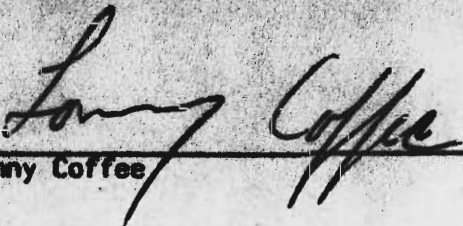

Phillip Askew

86040614045

NOWLIN SAVINGS

April 15, 1986

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Lonny Coffee

86040614046

NOWLIN SAVINGS

April 15, 1986

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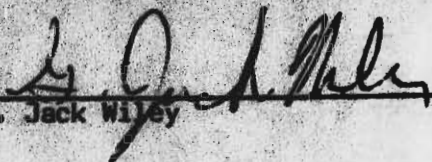
H. C. Wood

86040614047

NOWLIN SAVINGS

April 15, 1986

The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees. The undersigned further declares that all such expenditures made in the past were made with his/her consent.


G. Jack Wiley

86040614048

DEPOSIT TO THE ACCOUNT OF		ACCOUNT HOLDER'S RECEIPT	
PT ILLUSTRATION NUMBER	ACCOUNT NAME NOWLIN SAVINGS STATE PAC	ORDER OR OTHER ORDER	STAMPING NO.
ADDRESS		STYLE - QUANTITY	LIST NO OR NUMBER
CITY & STATE		COVER ☐ 1/1 & NO COVER NEEDED	37-708/3118
SPECIAL INSTRUCTIONS		DATE	RECEIVED BY:
NOWLIN SAVINGS HOME OFFICE P.O. BOX 350, F.W. TX 76101		CASH	CURRENCY
		CON	
		\$2,750.00	
		TOTAL	
		LESS CASH RECEIVED	
		NET DEPOSIT	\$2,750.00

0311973884057052538609

8-28-7 (QUB) 3-83

DOCUMENTS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE TERMS AND CONDITIONS OF THIS FINANCIAL INSTITUTION'S COLLECTION AGREEMENT.

ACCOUNT SIGNATURE CARD																	
☐ State	☒ Checking																
☐ Savings	☐ Other																
Account No. 570525386 (09)																	
Date of Birth 5-14-86																	
NOWLIN SAVINGS ASSOCIATION																	
(The Association) is a voluntary institution, agrees with Association to establish the above mentioned account and any additional accounts specified below, subject to the terms and conditions herein, to be added to the following name:																	
Account: NOWLIN SAVINGS STATE PAC 817-735-0715																	
Address: P.O. Box 350 Fort Worth, Texas 76101																	
ACCOUNT OWNERSHIP: ☐ Partnership: The Association is a partnership, and the first _____ of the undersigned are partners in said partnership. ☒ Corporation, Professional Corporation or Professional Association: The Association is a corporation, professional corporation or professional association, and the undersigned officers certify that those listed below as officers are duly elected officers of Association. ☐ Voluntary Association: The Association is a voluntary association, and the undersigned officers certify that those listed below as officers are duly elected officers of Association. ☐ Public Unit: The Association is the State of Texas, the United States, a political subdivision of the State of Texas or the United States, or a custodian of funds belonging to the State of Texas, the United States or a political subdivision thereof. If prohibited by law, the Association shall not become a member of the Association.																	
Each of the undersigned is duly authorized to act with respect to the account(s) and the Association is authorized to act (if partners relating to the account(s) upon the written order of any _____ of us until it receives written advice to the contrary from the Association or any of its authorized representatives.																	
AUTHORIZED SIGNATURES <table border="0"> <tr> <td>Name</td> <td>Title</td> <td>Name</td> <td>Title</td> </tr> <tr> <td>(1) <u>X</u></td> <td></td> <td>(4) _____</td> <td></td> </tr> <tr> <td>(2) <u>B. L. Johnson</u></td> <td></td> <td>(5) _____</td> <td></td> </tr> <tr> <td>(3) <u>X</u></td> <td></td> <td>(6) _____</td> <td></td> </tr> </table>		Name	Title	Name	Title	(1) <u>X</u>		(4) _____		(2) <u>B. L. Johnson</u>		(5) _____		(3) <u>X</u>		(6) _____	
Name	Title	Name	Title														
(1) <u>X</u>		(4) _____															
(2) <u>B. L. Johnson</u>		(5) _____															
(3) <u>X</u>		(6) _____															
(Corporation, Professional Corporation, Professional Association and Voluntary Association require resolution)																	
11-4502 Hart Graphics Inc. (12/83)																	

86040514049

NOWLIN SAVINGS



The undersigned hereby authorizes the use of any and all funds contributed by them to Nowlin Savings/Nowlin Mortgage Political Action Committee (NOWPAC or to National NOWPAC) for local, state or national elections or measures as determined in the sole discretion of the Chairman of such political action committees.

Name _____

Date _____

86040614050



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20462

August 22, 1984

August 22, 1984

AO 1984-31

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1984-31

Mr. James B. Cardle
Assistant Vice President and Economist
First Bank & Trust Company
Box 200
Booker, Texas 79005

Dear Mr. Cardle:

This responds to your letter of April 9, 1984, as supplemented by your letters of June 25 and August 10, 1984, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended, ("the Act"), to a proposed transfer to a separate segregated fund established by the First Bank & Trust Company.

You state that in late March 1984 you filed a Statement of Organization with the Commission for a separate segregated fund ("the Federal PAC") that proposes to make contributions in Federal elections. You also state that approximately two years ago your bank established a political action committee for state election purposes ("the State PAC"), and you propose to continue the operation of this committee for State election activity. Your request indicates that the State PAC solicited donations during the bank's Board of Directors meeting in February 1984, as well as during bank officer meetings held in early March 1984. You state that in all cases, donations to the State PAC were made on a voluntary basis. Furthermore, you indicate that contributions to the State PAC were made by (1) bank directors (who in all cases are also stockholders) and (2) officers of the bank (some of whom are also stockholders). You note that bank officers include individuals in both the executive and administrative areas of the bank. Your letter of August 10

Attachment III Page 1

86040614051

states that the State PAC proposes to transfer \$2,500 to \$3,000 to the Federal PAC. This amount consists of 48 contributions including 18 contributions of \$150 each from Board members.

You ask whether such a transfer may be made from the bank's State PAC to its Federal PAC. The Commission concludes that the proposed transfer may be made if the conditions noted below are satisfied.

The Commission notes initially that if the State PAC makes the proposed transfer of funds to the Federal PAC, the State PAC would become a political committee under 2 U.S.C. §431(4) and 11 CFR 100.5 and would be subject to the registration and reporting requirements for political committees. See Advisory Opinions 1982-46 and 1983-3, copies enclosed. On the other hand in this case, because your corporation has already established a Federal PAC, if the State PAC acts as a collecting agent under Commission regulations at 11 CFR 102.6(b) and (c), such a transfer may be made through the state account without the State Committee becoming a political committee with a reporting obligation to the Commission. In order to make such a transfer, the State PAC would be required to obtain written authorizations from the contributors involved stating their intent to make a contribution to the separate segregated fund under the regulations at §102.6(b) and (c) and §114.5. Any contributors who do not so state must either be given a refund, or their contributions must remain with the State PAC. Each contribution included in the amount transferred must be reported by the Federal PAC as a contribution from the original contributor to the extent required by Commission regulations. 11 CFR 102.6(c) (7), 104.12.

The Federal PAC is subject to all requirements of the Act and Commission regulations^{1/} including the contribution solicitation provisions set forth at 11 CFR 102.5 and 114.5. All contributions it receives are subject to the prohibitions and limits of the Act. In this case the Commission assumes that the

1/ If the State PAC is used exclusively for state and local political activity, it would not be required to register and file reports with the Commission. It would, however, be subject to the prohibition on contributions by national banks and Federally chartered corporations, 2 U.S.C. §441b, and the prohibition on contributions from foreign nationals, 2 U.S.C. §441e.

contributions are from individuals^{2/} and comply with the limitations of 2 U.S.C. §441a(a)(1).^{3/} However, inasmuch as the initial solicitation was for the State PAC, the contributors were not informed that their contributions should be designated for the Federal PAC, that they would be used in Federal elections, and that they were subject to the limitations of the Act. 11 CFR 102.5(a)(2). Accordingly, in order for the State PAC to be viewed as the collecting agent, the donors must state their intention, in writing, to contribute to the Federal PAC. Future contribution solicitations for the Federal PAC must meet all of the requirements of 11 CFR 114.5 and 102.5.

This response constitutes an advisory opinion concerning application of the Act, or regulations prescribed by the Commission, to the specific transaction or activity set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,

Thomas E. Harris

Thomas E. Harris
Vice Chairman for the
Federal Election Commission

^{2/} The Commission notes that on the basis of the information you have provided, all of the persons solicited by the State PAC were apparently either stockholders or executive or administrative personnel of the bank and were therefore permissible solicitees. See 2 U.S.C. §441b(b)(4)(A), §441b(b)(7).

^{3/} The \$25,000 annual limit is also applicable to the contributions in question, and their contributions are counted against their 1984 limit. 2 U.S.C. §441a(a)(3), 11 CFR 110.5.

Enclosures (AO's 1983-3, 1982-46)

III 3

86040614053

**REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL**

DATE: September 3, 1985

ANALYST: J. Hunter Bryan

- I. COMMITTEE:** Nowlin Savings/Nowlin Mortgage Political Action Committee (C00169219)
B. Larry Johnson, Treasurer
2821 Lackland Road
Fort Worth, TX 76116
- II. RELEVANT STATUTE:** 11 CFR 102.5(a)
- III. BACKGROUND:**

Receipt of Funds From a Non-Federal Account

Nowlin Savings/Nowlin Mortgage Political Action Committee ("NowPAC") disclosed receipts totalling \$13,950 from its non-Federal account ("the State PAC") in 1984. The 1984 April Quarterly Report disclosed a receipt of \$3,000 on March 13, 1984 (Attachment 2). The 1984 July Quarterly Report disclosed another receipt of \$10,950 on June 18, 1984 (Attachment 3).

A Request for Additional Information ("RFAI") was sent to NowPAC on May 8, 1985 asking the committee to clarify whether the transfers were made from an account maintained for non-Federal activity (Attachment 4). NowPAC was advised that such activity is prohibited by 11 CFR 102.5, and the full amount of the transfers should be returned to the non-Federal account.

Mr. B. Larry Johnson, the treasurer of NowPAC, called the Commission on May 21, 1985 to discuss the RFAI. Mr. Johnson indicated that there had been a consolidation of the two PACs (Attachment 5). The Reports Analysis Division ("RAD") analyst asked Mr. Johnson to respond in writing and to provide documentation of the source of funds. Since NowPAC failed to submit the requested information, a Second Notice was sent on May 30, 1985 (Attachment 6).

Mr. Johnson submitted a letter of explanation, which was received at the Commission on June 10, 1985 (Attachment 7). According to Mr. Johnson's response, Nowlin Savings

**NOWLIN SVINGS/NOWLIN MORTGAGE
POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

Association and Nowlin Mortgage Company established two political action committees ("PACs") in early 1983.^{2/} One PAC was for state and local purposes, and the other was for "national purposes." Contributions to the two PACs were received from the directors and officers of the above two companies. In June of 1984, however, a decision was made to consolidate the two PACs. Although Mr. Johnson did not explain the reason for merging the committees, he did provide a listing of the contributors from "... early 1983 to the merger date on June 20, 1984."

The RAD analyst called Mr. Johnson on July 1, 1985 to ask whether the contributors to the State PAC had authorized the transfer of funds to the Federal PAC. The RAD analyst informed Mr. Johnson that he would send the regulations and a copy of Advisory Opinion 1984-31 for his reference (Attachment 8).

On July 19, 1985, the RAD analyst phoned Mr. Johnson to request a written explanation on the manner in which the decision to consolidate the two PACs was made (Attachment 9). In addition, the RAD analyst informed Mr. Johnson that even if the transfers were made in accordance with the guidelines of AO 1984-31, the activity may not be permissible.

In response to the telephone conversation, Mr. Johnson submitted a letter of explanation on July 23, 1985 (Attachment 10). The letter stated that "... the sole purpose of combining the PACs was to ease the administrative burden." A resolution was passed by the corporation's Board of Directors on April 18, 1984 authorizing management to combine the committees. Included with Mr. Johnson's letter was a Certification of Corporate Resolution and supporting receipt schedules disclosing the contributors to the State PAC.

^{2/} On August 26, 1985 the RAD analyst called Mr. Johnson to request an explanation of the relationship between Nowlin Savings Association ("NSA") and Nowlin Mortgage Company ("NMC"). Mr. Johnson stated that the shareholders of NMC bought NSA and made NSA the parent organization (Attachment 11). Mr. Johnson submitted a letter on August 28, 1985 which stated "... effective April 1, 1982, the shareholders of NMC became the shareholders of NSA.... Thereby, NMC was a subsidiary of NSA." He also provided a copy of their 1982 Annual Report for background information (Attachment 12).

**BOWLIN SVINGS/BOWLIN MORTGAGE
POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3**

To date NowPAC has not disposed of the funds received from its State PAC.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

86040614056

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 30AUG85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION

NONPAC (FORMERLY NATIONAL NONPAC)	NON-PARTY NON-QUALIFIED ID 0C00169219					
CONNECTED ORGANIZATION: NONPAC						
1983 STATEMENT OF ORGANIZATION				0AUG83	2	03FEC/280/4973
YEAR-END		1,000	200	2AUG83 -31DEC83	8	04FEC/295/2701
YEAR-END - AMENDMENT		-	-	2AUG83 -31DEC83	6	05FEC/373/2589
YEAR-END - AMENDMENT		-	-	2AUG83 -31DEC83	14	05FEC/301/0339
REQUEST FOR ADDITIONAL INFORMATION				2AUG83 -31DEC83	3	05FEC/373/0225
REQUEST FOR ADDITIONAL INFORMATION 2ND				2AUG83 -31DEC83	6	05FEC/374/5199
1984 STATEMENT OF ORGANIZATION - AMENDMENT				16APR84	2	04FEC/309/3898
MISCELLANEOUS REPORT				16JUL84 TO FEC	2	04FEC/323/0905
APRIL QUARTERLY		3,000	3,500	1JAN81 -31MAR84	4	04FEC/314/1498
APRIL QUARTERLY - AMENDMENT		-	-	1JAN84 -31MAR84	1	05FEC/373/3536
APRIL QUARTERLY - AMENDMENT		-	-	1JAN84 -31MAR84	1	05FEC/301/0798
REQUEST FOR ADDITIONAL INFORMATION				1JAN84 -31MAR84	1	05FEC/373/0973
REQUEST FOR ADDITIONAL INFORMATION 2ND				1JAN84 -31MAR84	1	05FEC/373/0093
JULY QUARTERLY		0	300	1APR84 -30JUN84	4	04FEC/320/3815
JULY QUARTERLY - AMENDMENT		10,950	1,300	1APR84 -30JUN84	7	04FEC/343/2871
JULY QUARTERLY - AMENDMENT		-	-	1APR84 -30JUN84	1	05FEC/373/3535
JULY QUARTERLY - AMENDMENT		-	-	1APR84 -30JUN84	1	05FEC/301/0799
REQUEST FOR ADDITIONAL INFORMATION				1APR84 -30JUN84	1	05FEC/373/0974
REQUEST FOR ADDITIONAL INFORMATION 2ND				1APR84 -30JUN84	1	05FEC/373/0094
OCTOBER QUARTERLY		500	3,850	1JUL84 -30SEP84	6	04FEC/343/2878
1ST LETTER INFORMATIONAL NOTICE				1JUL84 -30SEP84	3	05FEC/361/4258
PRE-GENERAL		0	3,550	1OCT84 -17OCT84	6	04FEC/347/0685
PRE-GENERAL - AMENDMENT		0	3,550	1OCT84 -17OCT84	6	05FEC/363/1687
POST-GENERAL		0	1,410	18OCT84 -26NOV84	5	04FEC/353/1847
YEAR-END		2,000	500	27NOV84 -31DEC84	5	05FEC/363/1682
YEAR-END - AMENDMENT		2,000	500	27NOV84 -31DEC84	6	05FEC/367/0274
1985 REQUEST FOR ADDITIONAL INFORMATION					1	05FEC/362/2664
REQUEST FOR ADDITIONAL INFORMATION 2ND					2	05FEC/366/4240
TOTAL		17,450	0	14,310	0	105 TOTAL PAGES

All reports reviewed.
Ending Cash (12/31/84): \$3,140
No debts owed to/by.

Attachment 1
(Page 1 of 2)

8 6 0 4 0 6 1 4 0 5 7

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 30AUG85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
HOWLIN SAVINGS/HOWLIN MORTGAGE POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: HOWLIN SAVINGS ASSOCIATION (NSA)						NON-PARTY NON-QUALIFIED ID 0C00169219
1985 MISCELLANEOUS REPORT				5FEB85 TO FEC	2	05FEC/365/0203
STATEMENT OF ORGANIZATION - AMENDMENT				22FEB85	2	05FEC/366/4341
STATEMENT OF ORGANIZATION - AMENDMENT				28AUG85	6	05FEC/386/4933
FEBRUARY MONTHLY	2,000	3,200		1JAN85 -31JAN85	5	05FEC/366/1013
MARCH MONTHLY	1,663	1,350		1FEB85 -28FEB85	5	05FEC/368/4084
APRIL MONTHLY	4,200	750		1MAR85 -31MAR85	5	05FEC/371/1086
MAY MONTHLY	1,800	3,500		1APR85 -30APR85	5	05FEC/374/0615
JUNE MONTHLY	500	300		1MAY85 -31MAY85	5	05FEC/376/3681
JULY MONTHLY	2,500	500		1JUN85 -30JUN85	4	05FEC/383/1146
AUGUST MONTHLY	0	0		1JUL85 -31JUL85	5	05FEC/386/0871
TOTAL	12,663	0	9,600		44	TOTAL PAGES

No reports reviewed.
Ending Cash (7/31/85): 06,302
No debts owed to/by.

Attachment 1
(page 2 of 2)

8 6 0 4 0 6 1 4 0 5 8

Attachment 2
1984 April Quarterly Report

GENERAL

FINANCIAL REPORT

Check for 1 to 3
Check for 4 to 6
Check for 7 to 9
Check for 10 to 12

NATIONAL EMPLOYER			
1. Full Name, Mailing Address and ZIP Code	Name of Employer	Date Incept. (Mo., Year)	Amount of Loan Repaid This Period
EMPLOYER 3021 Lockland Road Fort Worth, Texas 76116		3-13-84	3,000.00 <i>JB</i>
2. Full Name, Mailing Address and ZIP Code			
3. Full Name, Mailing Address and ZIP Code			
4. Full Name, Mailing Address and ZIP Code			
5. Full Name, Mailing Address and ZIP Code			
6. Full Name, Mailing Address and ZIP Code			
7. Full Name, Mailing Address and ZIP Code			
8. Full Name, Mailing Address and ZIP Code			
9. Full Name, Mailing Address and ZIP Code			
10. Full Name, Mailing Address and ZIP Code			
11. Full Name, Mailing Address and ZIP Code			
12. Full Name, Mailing Address and ZIP Code			
SUBTOTAL of Repaid This Period (Include 1)			
TOTAL This Period (Add paid this time neither give)			

86040514059

8103314130

7

**Attachment 3
1984 July Quarterly Report**

SCHEDULE A

FINISHED RECEIPTS

For the quarter ending 7/1/84
The amount of the receipts
is \$10,950.00

Name (Formerly NATIONAL CONTACT)		Date of Receipt	Amount of Receipt
A. Full Name, Working Address and ZIP Code 1021 Lakeland Road Fort Worth, Texas 76116		6-18-84	10,950.00
B. Full Name, Working Address and ZIP Code			
C. Full Name, Working Address and ZIP Code			
D. Full Name, Working Address and ZIP Code			
E. Full Name, Working Address and ZIP Code			
F. Full Name, Working Address and ZIP Code			
G. Full Name, Working Address and ZIP Code			
H. Full Name, Working Address and ZIP Code			
I. Full Name, Working Address and ZIP Code			
J. Full Name, Working Address and ZIP Code			
K. Full Name, Working Address and ZIP Code			
L. Full Name, Working Address and ZIP Code			
M. Full Name, Working Address and ZIP Code			
N. Full Name, Working Address and ZIP Code			
O. Full Name, Working Address and ZIP Code			
P. Full Name, Working Address and ZIP Code			
Q. Full Name, Working Address and ZIP Code			
R. Full Name, Working Address and ZIP Code			
S. Full Name, Working Address and ZIP Code			
T. Full Name, Working Address and ZIP Code			
U. Full Name, Working Address and ZIP Code			
V. Full Name, Working Address and ZIP Code			
W. Full Name, Working Address and ZIP Code			
X. Full Name, Working Address and ZIP Code			
Y. Full Name, Working Address and ZIP Code			
Z. Full Name, Working Address and ZIP Code			

JB

8

86040614060

9415699973



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

20-2

B. Larry Johnson, Treasurer
Howlin Savings/Howlin Mortgage
Political Action Committee
2021 Lockland Road
Fort Worth, TX 76116

NY 8 885

Identification Number: C00169219

Reference: Year End (8/2/83-12/31/83), April Quarterly (1/1/84-3/31/84), and July Quarterly (4/1/84-6/30/84) Reports

Dear Mr. Johnson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your reports discloses receipts from HOWPAC (pertinent portions attached). Please clarify whether these transfers are from an account maintained by your committee for non-Federal activity. If so, be advised that such transfers are prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfers should be returned to the non-Federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfers-out. In addition, the transfers-out should be disclosed on a supporting Schedule B for Line 27 of your next report.

If, however, these transactions represent an "internal transfer" of funds from one Federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your reports accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-Federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

9

In accordance to your original report(s) correcting the above
problem(s) should be filed with the Federal Election Commission
within fifteen (15) days of the date of this letter. If you need
assistance, please feel free to contact me on our toll-free
number, (800) 424-6449. My local number is (202) 523-4040.

Sincerely,

J. Hunter Bryan

J. Hunter Bryan
Reports Analyst
Reports Analysis Division

86040614002
95033730230

TELECOM

ANALYST: Bryan
CONVERSATION WITH: B. Larry Johnson
COMMITTEE: HowPAC
DATE: 5/21/85
SUBJECT(S):

Mr. Johnson called to discuss the May 8 RFAI. Specifically, he explained the decision to consolidate the two PACs. The RAD analyst asked Mr. Johnson to respond in writing and also to provide documentation of the source of funds.

86040614063



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

HQ-3

May 29, 1985

B. Larry Johnson, Treasurer
Howlin Savings/Howlin Mortgage
Political Action Committee
2921 Lackland Road
Fort Worth, TX 76116

Identification Number: C00169219

Reference: 1983 Year-End (8/2/83-12/31/83), 1984 April Quarterly
(1/1/84-3/31/84), and 1984 July Quarterly (4/1/84-
6/30/84) Reports

Dear Mr. Johnson:

This letter is to inform you that as of May 29, 1985, the Commission has not received your response to our request for additional information, dated May 8, 1985. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Hunter Bryan on our toll-free number (800) 424-9530 or our local number (202) 523-4040.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

12

Attachment 7
(page 1 of 4)

June 4, 1983

Mr. J. Hunter Bryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Identification Number: CDD169219

Dear Mr. Bryan:

Your letter of May 8, 1983 requested clarification of transfers into the "National Newspaper" account from the "Newspaper" account on the following dates and in the amounts indicated:

10-11-83	\$ 1,000.00
3-13-84	3,000.00
6-18-84	10,990.00

In early 1983, Nowlin Savings Association and Nowlin Mortgage Company established two PAC's. NOWPAC was to be used for state and local purposes; NATIONAL NOWPAC was to be used for national purposes. These PAC's were funded by the directors and officers of the above two companies.

In June 1984, it was decided to consolidate the two PAC's and from then on, report to the FEC and the Secretary of State of Texas. Attached is a copy of a letter we forwarded in this regard.

On May 21, 1984, we discussed this matter and you requested that we forward a detailed listing of the contributors to the PAC's from its inception in early 1983 to the merger date on June 20, 1984. Attached is this listing that shows the contributor, date and amount. As previously stated, all named individuals were either officers or directors of Nowlin Savings Association or Nowlin Mortgage Company.

If you have any further questions or desire any additional information, please contact me (817-733-0715).

Sincerely yours,

B. Larry Johnson
B. Larry Johnson
Treasurer, NOWPAC

BLJ/cs

Enclosures

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

October 10, 1984

Federal Election Commission
1200 K Street, N.W.
Washington, D.C. 20543

To: Hon. J. Roy Harris

Re: June 18, 1984, letter received by FIC with the above address

<u> </u>	<u> </u>	<u> </u>
• National NEUPAC	For the Federal Elections	Federal Election Commission
• NEUPAC	For the Local & State (House) Elections	Secretary of State State of Texas

On June 18, 1984, NEUPAC was merged into National NEUPAC. The name of National NEUPAC was changed to NEUPAC. The merged NEUPAC will continue to make contributions to candidates for Federal, State and Local Elections. The details of such activities will be reported to the appropriate regulators in accordance with their rules and regulations.

Baker John
B. Baker
Treasurer
NEUPAC

EXPENSES - 1983

12/31/83

EXPENSES

H. C. Wood
Malcolm Whiting, Jr.
James F. Brennan
Sam E. Ray
Jack York
G. Jack Wiley
Wade T. Houslin
Georgia Hill
Susan Fernandez
Phillip Asher
Lorrey Coffey
H. Rob Frenzel
John Smith
William Eikenberry
Martin Hagan
John E. Driscoll, Sr.
Jim Withers
J. Ray Taylor
Allen Jones
H. L. Houslin
H. Rob Frenzel
G. Jack Wiley
H. C. Wood
Kenneth Garrett
H. Rob Frenzel
H. C. Wood
William Eikenberry
G. Jack Wiley
H. Rob Frenzel
H. Rob Frenzel

Total-1983

\$14,320

RECEIPTS - 1984

Wade T. Houslin
G. Jack Wiley
Richard Driscoll
Phillip Asher
James F. Brennan
Lorrey Coffey

2,000
1,000
1,000
1,000
1,000
375

RECEIPTS—1984 (cont'd)

DATE	NAME	AMOUNT
2/78	Sam R. Ray	100
	William Chambers	100
	Sam Fennell	100
	H. Bob Fennell	100
	Harold Garrett	100
	Georgia Hill	100
	G. Larry Johnson	100
	Allen Jones	100
	Walter H. Martin, Jr.	100
	Martin Morgan	100
	Wade Martin, Jr.	100
	Douglas H. Porter	100
	John Smith	100
	J. Ray Taylor	100
	G. Jack Wiley	100
	Jack York	100
2/25	John E. Orinall, Jr.	100
6/78	Deposit from National NRPAC (to close account)	100
	Total—1984 (to 6/28/84)	\$14,300
	Total—1983	\$14,300
	Total—1984 (to 6/28/84)	\$28,600
	Total—1983 & 1984	\$28,600
	Less Various Contributions— (PACs, State, Federal, Local)	
	1983 \$ 9,275	
	1984 6,425	
	Balance--6/28/84	\$12,900

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

B. Larry Johnson
B. Larry Johnson
Treasurer

6-5-85
Date

TELECON

ANALYST : HUNTER BRYAN
CONVERSATION WITH : B. LARRY JOHNSON
COMMITTEE : NowPAC
DATE : July 1, 1985
SUBJECT : CLARIFICATION OF TRANSFERS
FROM STATE PAC

I called Mr. Johnson to request additional information concerning the transfers from the State PAC. I explained that unless the contributors to the State PAC had provided written authorization for their contributions to be used for the purpose of influencing Federal elections (per the guidelines of AO 1984-31), the transfer may be impermissible.

Appropriate information (i.e., the regulations and a copy of AO 1984-31) was sent in order to assist Mr. Johnson in preparing his response.

TELECON

ANALYST : HUNTER BRYAN
CONVERSATION WITH : B. LARRY JOHNSON
COMMITTEE : NowPAC
DATE : JULY 19, 1985
SUBJECT : ADDITIONAL BACKGROUND ON THE TRANSFERS
FROM THE STATE PAC

I called Mr. Johnson to find out if he had received the information mailed on July 1, 1985. I asked if he understood the advisory opinion, and explained that even if the transfers were made according to the guidelines of AO 1984-31, it would not necessarily mean that the activity was permissible.

I informed Mr. Johnson that any information that he could provide would be helpful. I specifically requested that the source of funds be itemized on a supporting receipt schedule and that an explanation be provided concerning the decision to consolidate the two PACs.

RECEIVED
JUL 22 1963

July 22, 1963

Attachment 10
(page 1 of 9)

Mr. J. Walter Bryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Dear Mr. Bryan:

The enclosed reports, which are actual Schedule A's for 1963 and the period ended June 30, 1964 when the funds were expended. Refer to my letter of June 4, 1963 for a detailed description of this copying of PAC bank accounts.

These reports are a detailed description of the activities of the Austin Savings Association Board of Directors as of April 30, 1964 that indicated disbursements to various the amounts.

As I had previously indicated, we collect contributions only from senior officers and directors. All of these are also shareholders. At each shareholders' annual meeting (held in April each year) it is the practice of the Chairman of the Board to review the activity of the PAC with the shareholders. This review would include the beginning balance of the PAC, receipts for the year, a detailed description of the contributions were made to (i.e., state, office savings, state or federal), aggregate disbursements and ending balance.

As I have indicated, the sole purpose of combining the PACs was to ease the administrative burden. We fully intended and have reported all receipts and disbursements (whether state or federal), to both the Secretary of the State of Texas and the Federal Election Commission. However, we totally overlooked the source of the funds transferred on June 28, 1964. I hope with my letter of June 4, 1963 and this, we have corrected this oversight.

If you need any additional information, do not hesitate to contact me.

Sincerely yours,

B. L. Long
B. L. Long
Treasurer
Austin Savings/Austin Savings PAC

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED
DATE 10-10-80 BY 1043

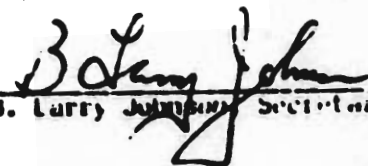
19

CERTIFICATION OF CORPORATE RESOLUTION

I, B. Larry Johnson, being the duly constituted Executive Vice President and Secretary of Nwlin Savings Association, a corporation organized and existing under and by virtue of the laws of the State of Texas (hereinafter called this corporation), do hereby certify that the following is a true and complete copy of a Resolution duly adopted at the meeting of the Board of Directors of this corporation duly called and held on April 18, 1985, at which a quorum was present and voting; that said Resolution is still in full force and effect and has not been rescinded; and that said Resolution is not in conflict with the Charter or Bylaws of this corporation:

RESOLVED, That the Board of Directors of the Company authorize management to combine the Federal PAC and the State PAC and to make appropriate filings with the Federal Elections Commission and the Secretary of the State of Texas.

IN WITNESS WHEREOF I HAVE HEREUNTO SET MY HAND AND THE SEAL OF THIS CORPORATION THIS 1ST DAY OF JULY, 1985


B. Larry Johnson Secretary

SCHEDULE A

Attachment 10
(page 4 of 9)

Any information reported herein with respect to a contribution may not be used to certify any person for the purpose of obtaining contributions or for any other purpose, other than using the name and address of any individual given above to obtain contributions from such persons.			
Name of Contributor (in Full)			
A. Full Name, Mailing Address and ZIP Code Georgia S. Hall 4216 Rickover Dr. Dallas, TX 75244	Name of Employer Marlin Mortgage Co.	Date Month, day, year 5/24/83	Amount of Cash Received This Period 1,000.00
Reason For: ☒ Primary ☐ General ☐ Other (specify)	Occupation Vice President Aggregate Year-to-Date - \$ 1,000.00		
B. Full Name, Mailing Address and ZIP Code Susan Ferreira 9990 Lindenshire Dallas, TX 75230	Name of Employer Marlin Mortgage Co.	Date Month, day, year 5/24/83	Amount of Cash Received This Period 1,000.00
Reason For: ☒ Primary ☐ General ☐ Other (specify)	Occupation Senior Vice President Aggregate Year-to-Date - \$ 1,000.00		
C. Full Name, Mailing Address and ZIP Code Phillip Ashaw 4859 Forest Lane Dallas, TX 75234	Name of Employer Marlin Mortgage Co.	Date Month, day, year 5/24/83	Amount of Cash Received This Period 600.00
Reason For: ☒ Primary ☐ General ☐ Other (specify)	Occupation Vice President Aggregate Year-to-Date - \$ 600.00		
D. Full Name, Mailing Address and ZIP Code Larry Coffey 4723 Anchorage Arlington, TX 76016	Name of Employer Marlin Mortgage Co.	Date Month, day, year 5/25/83	Amount of Cash Received This Period 350.00
Reason For: ☒ Primary ☐ General ☐ Other (specify)	Occupation Vice President Aggregate Year-to-Date - \$ 350.00		
E. Full Name, Mailing Address and ZIP Code H. Rob Prenzler 7010 Lake Louise Arlington, TX 76016	Name of Employer Marlin Savings Assn Marlin Mortgage Co.	Date Month, day, year 6/1/83 8/24/83 10/17/83 12/18/83 12/20/83	Amount of Cash Received This Period 50.00 100.00 50.00 100.00 50.00
Reason For: ☒ Primary ☐ General ☐ Other (specify)	Occupation Senior Vice President Aggregate Year-to-Date - \$ 350.00		
F. Full Name, Mailing Address and ZIP Code John Smith 108 Ricky Lane Burleson, TX 76028	Name of Employer Marlin Mortgage Co.	Date Month, day, year 6/2/83	Amount of Cash Received This Period 1,000.00
Reason For: ☒ Primary ☐ General ☐ Other (specify)	Occupation Senior Vice President Aggregate Year-to-Date - \$ 1,000.00		
G. Full Name, Mailing Address and ZIP Code William Eikenberry 2625 Cockrell Fort Worth, TX 76109	Name of Employer Marlin Mortgage Co.	Date Month, day, year 6/2/83 11/4/83	Amount of Cash Received This Period 150.00 100.00
Reason For: ☒ Primary ☐ General ☐ Other (specify)	Occupation Vice President Aggregate Year-to-Date - \$ 250.00		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (Use only the last number only)			

22

SCHEDULE A

STANDARD RECEIPTS

Page 2 of 2
Last Name

Attachment 10
(page 5 of 9)

Any information reported from such receipts or statements may not be used by any person for the purpose of making contributions or for payment of benefits, either on the basis of the name and address of any individual appearing on such contributions from such sources.

Name of Contributor (in full)

A. Full Name, Mailing Address and ZIP Code

Martin Morgan
5722 Overbrook Dr
Dallas, TX 75230

Name of Employer

Nowlin Mortgage Co.

Date (month, day, year)

6/8/83

Amount of Cash Received This Period

700.00

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Occupation

Nowlin Mortgage Co.

Aggregate Year-to-Date-\$ 700.00

B. Full Name, Mailing Address and ZIP Code

John E. McDaniel, Jr.
4716 Westport Dr
Dallas, TX 75234

Name of Employer

Nowlin Savings Assn.
Nowlin Mortgage Co.

Date (month, day, year)

6/28/83

Amount of Cash Received This Period

250.00

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Occupation

Vice President/Secretary

Aggregate Year-to-Date-\$ 250.00

C. Full Name, Mailing Address and ZIP Code

J. Ray Taylor
3695 Encanto
Fort Worth, TX 76109

Name of Employer

Nowlin Savings Assn.

Date (month, day, year)

7/5/83

Amount of Cash Received This Period

500.00

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Occupation

Director

Aggregate Year-to-Date-\$ 500.00

D. Full Name, Mailing Address and ZIP Code

Allen Jones
P O Box 65001
Denver, CO 80206

Name of Employer

Nowlin Savings Assn.

Date (month, day, year)

7/26/83

Amount of Cash Received This Period

250.00

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Occupation

Vice President

Aggregate Year-to-Date-\$ 250.00

E. Full Name, Mailing Address and ZIP Code

M. L. Maciejewski
8111 Schaffer
Houston, TX 77070

Name of Employer

Nowlin Mortgage Co.

Date (month, day, year)

8/1/83

Amount of Cash Received This Period

300.00

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Occupation

Vice President

Aggregate Year-to-Date-\$ 300.00

F. Full Name, Mailing Address and ZIP Code

Kenneth Garrett
4900 Mastridge Ave
Fort Worth, TX 76116

Name of Employer

Nowlin Savings Assn.

Date (month, day, year)

9/6/83

Amount of Cash Received This Period

500.00

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Occupation

Director

Aggregate Year-to-Date-\$ 500.00

G. Full Name, Mailing Address and ZIP Code

Jim Withrow
1507 ElCamino Real
Apt. 1108
Bullock, TX 76039

Name of Employer

Nowlin Mortgage Co.

Date (month, day, year)

6/28/83

Amount of Cash Received This Period

300.00

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Occupation

Vice President

Aggregate Year-to-Date-\$ 300.00

TOTAL of Receipts This Page (continued).....

TOTAL This Period (last Page this line carries only)

14,350.00

23

Full Name, Mailing Address and ZIP Code John T. Nowlin 910 Buckwood Fort Worth, TX 76107				Name of Employer Nowlin Savings Assn. Nowlin Mortgage Co.	Date Month, day, year 3/26/84	Amount of Cash Received This Period 2,000.00
Request For: ☒ Primary ☐ General ☐ Other (specify):				Occupation Chairman Aggregate Year-to-Date-\$ 2,000.00		
Full Name, Mailing Address and ZIP Code John Wiley 705 Chatham Ct. Arlington, TX 76011				Name of Employer Nowlin Mortgage Co.	Date Month, day, year 3/76 2/10	Amount of Cash Received This Period 500.00 500.00
Request For: ☒ Primary ☐ General ☐ Other (specify):				Occupation Executive Vice President Aggregate Year-to-Date-\$ 1,000.00		
Full Name, Mailing Address and ZIP Code Richard Driscoll 12 Greenwood Lane Rosario, TX 76362				Name of Employer Nowlin Savings Assn. Nowlin Mortgage Co.	Date Month, day, year 4/1/84	Amount of Cash Received This Period 300.00
Request For: ☒ Primary ☐ General ☐ Other (specify):				Occupation VP & Controller Aggregate Year-to-Date-\$ 300.00		
Full Name, Mailing Address and ZIP Code Philip Adams 4059 Forest Lane Dallas, TX 75234				Name of Employer Nowlin Mortgage Co.	Date Month, day, year 5/10/84	Amount of Cash Received This Period 500.00
Request For: ☒ Primary ☐ General ☐ Other (specify):				Occupation Vice President Aggregate Year-to-Date-\$ 650.00		
Full Name, Mailing Address and ZIP Code James P. Beckman 1901 Indian Creek Dr. Fort Worth, TX 76107				Name of Employer Nowlin Savings Assn.	Date Month, day, year 5/10/84	Amount of Cash Received This Period 500.00
Request For: ☒ Primary ☐ General ☐ Other (specify):				Occupation Director Aggregate Year-to-Date-\$ 500.00		
Full Name, Mailing Address and ZIP Code Lanny Coffey 4723 Anchorage Arlington, TX 76016				Name of Employer Nowlin Mortgage Co.	Date Month, day, year 5/10/84	Amount of Cash Received This Period 375.00
Request For: ☒ Primary ☐ General ☐ Other (specify):				Occupation Vice President Aggregate Year-to-Date-\$ 375.00		
Full Name, Mailing Address and ZIP Code Sam R. Day 2309 Redford Ct. E Fort Worth, TX 76109				Name of Employer Nowlin Savings Assn.	Date Month, day, year 5/10/84	Amount of Cash Received This Period 500.00
Request For: ☒ Primary ☐ General ☐ Other (specify):				Occupation Director Aggregate Year-to-Date-\$ 500.00		
GRAND TOTAL of Receipts This Page (optional)						
TOTAL This Period (last page this line number only)						

SCHEDULE A

ITEMIZED RECEIPTS

Line Number

Attachment 10
(page 7 of 9)

Any information reported here with respect to Schedule A may not be used by any person for the purpose of obtaining contributions or for any other purpose, other than the purpose and subject of the Federal election laws, to which contributions have been made.

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
William E. Hensley 3625 Oakwell Fort Worth, TX 76109	Nowlin Mortgage Co. Vice President	5/10/84	300.00
Receipt For ☒ Primary ☐ General		Aggregate Year-to-Date - \$ 300.00	
Susan Ferreira 9090 Lindshire Dallas, TX 75230	Nowlin Mortgage Co. Sr. VP	5/10/84	1,500.00
Receipt For ☒ Primary ☐ General		Aggregate Year-to-Date - \$	
H. Rob Frouncl 7010 L.A. Loulier Arlington, TX 76016	Nowlin Mortgage Co. Nowlin Savings Assn Sr. VP	5/10/84	500.00
Receipt For ☒ Primary ☐ General		Aggregate Year-to-Date - \$ 500.00	
Kenneth Garrett 4900 Westridge Ave. Fort Worth, TX 76116	Nowlin Savings Assn. Director	5/10/84	500.00
Receipt For ☒ Primary ☐ General		Aggregate Year-to-Date - \$ 500.00	
Georgia Hill 4216 Richover Dr. Dallas, TX 75244	Nowlin Mortgage Co. Vice President	5/10/84	650.00
Receipt For ☒ Primary ☐ General		Aggregate Year-to-Date - \$ 650.00	
B. Larry Johnson 6909 Serrano Dr. Fort Worth, TX 76126	Nowlin Savings Assn. Vice President	5/10/84	400.00
Receipt For ☒ Primary ☐ General		Aggregate Year-to-Date - \$ 400.00	
Allen Jones	Nowlin Savings Assn. Vice President	5/10/84	400.00
Receipt For ☒ Primary ☐ General		Aggregate Year-to-Date - \$ 400.00	
* TOTAL of Receipts This Page (optional)			
TOTAL ** (For use only for this line number only)			

25

860;400;349730

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each
other schedule which must be attached

Attachment 10
(page 8 of 9)

Any information received from such Reports or Statements may not be sold or used by any person for the purpose of obtaining a credit rating or for the purpose of determining the creditworthiness of any person, or for any other purpose, without the express written consent of the donor.

Name of Donor (to Full)

A. Full Name, Mailing Address and ZIP Code Walter Madden, Jr. 2701 Tickle Amarillo, TX 79106 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Director Aggregate Year-to-Date - \$ 300.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
B. Full Name, Mailing Address and ZIP Code Martin Morgan 5722 Over Dunes Dr Dallas, TX 75239 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Vice President Aggregate Year-to-Date - \$ 700.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 700.00
C. Full Name, Mailing Address and ZIP Code Wade Nowlin, Jr. 6802 Rowwood Dallas, TX 75214 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Director Aggregate Year-to-Date - \$ 300.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
D. Full Name, Mailing Address and ZIP Code Douglas M. Porter 3816 Hickory Springs Rd Fort Worth, TX 76116 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation President Aggregate Year-to-Date - \$ 750.00	Date (month, day, year) 4/10/84	Amount of Each Receipt This Period 750.00
E. Full Name, Mailing Address and ZIP Code John Smith 108 Ricky Lane Burleson, TX 76028 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Sr. VP Aggregate Year-to-Date - \$ 750.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 750.00
F. Full Name, Mailing Address and ZIP Code J. Ray Taylor 3695 Encanto Fort Worth, TX 76109 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Director Aggregate Year-to-Date - \$ 300.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
G. Full Name, Mailing Address and ZIP Code Jack York 3424 Hilldale Rd. Fort Worth, TX 76107 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Director Aggregate Year-to-Date - \$ 300.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00

US TOTAL of Receipts This Page (optional)

TOTAL To: Form 990 (Page 10) (this line number only)

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SCHEDULE A

ITEMIZED RECEIPTS

Page 4 of 4
 Attachment 10
 (page 9 of 9)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of advertising or purposes, other than using the name and address of any person mentioned to obtain other business from such person.

Name of, Company (in Full)

A. Full Name, Mailing Address and ZIP Code John E. Driscoll, Jr. (deceased) 4716 Tuleport Rd Dallas, TX 75234 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Vice President & Secretary Aggregate Year-to-Date - \$ 250.00	Date Month, day, year 5/25/84 Amount of Each Receipt This Period 250.00
B. Full Name, Mailing Address and ZIP Code Deposit from National KKKAC to close account Receipt For ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date - \$	Date Month, day, year 8/1/84 Amount of Each Receipt This Period 300.00
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
JBTOTAL of Receipts This Page (optional)		
TOTAL This Page (print this line number only)		

27

TELECOM

ANALYST: Bryan

CONVERSATION WITH: B. Larry Johnson

COMMITTEE: NowPAC

DATE: 8/26/85

SUBJECT(S): Affiliation of Nowlin Savings Association and
Nowlin Mortgage Company

The RAD analyst called Mr. Johnson to request that he explain the relationship of Nowlin Savings Association (NSA) and Nowlin Mortgage Company (NMC). Mr. Johnson explained that the shareholders of NMC bought NSA and made NSA the parent and NMC the subsidiary. This would indicate that NSA is the connected organization.

Mr. Johnson also stated that he would provide written documentation detailing the affiliation.

Nowlin Savings

RECEIVED A. THE FEC

85 AUG 28 AM: 47

Attachment 12
(page 1 of 6)

August 26, 1985

Mr. J. Hunter Bryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K. Street, NW
Washington, DC 20463

Dear Mr. Bryan:

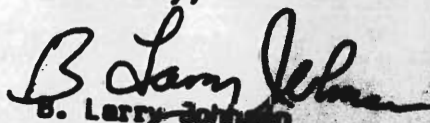
Per our conversation of today, you requested that I detail the affiliation of Nowlin Savings Association (NSA) and Nowlin Mortgage Company (NMC), and also to tie this into the merger of the PACs.

As indicated in Note 1 and 2 of Notes to Consolidated Financial Statements included in the 1982 Annual Report of Nowlin Savings Association (copy attached), effective April 1, 1982, the shareholders of NMC became the shareholders of NSA (formerly Cross Timbers Savings & Loan Association). Thereby, NMC was a subsidiary of NSA.

On April 4, 1983, NOWPAC and National NOWPAC were established. On June 20, 1984, it was decided (after consultation with your office - see letter dated June 4, 1985 and attachments) to consolidate the two PACs and file appropriate reports with both the Federal Elections Commission and the Secretary of the State of Texas. See letter dated July 22, 1985 and attachments.

I hope this details this matter completely. If you need more information, however, please call.

Sincerely,



B. Larry Johnson
Nowlin Mortgage/Nowlin Savings
Political Action Committee

dw
attachments

29

NOWLIN SAVINGS

1982 Annual Report

NOWLIN MORTGAGE

86040614082

(Note: Only the relevant portions have been provided.)

30

Newlin Savings Association provides depository services for residents in Tarrant, Hood and Erath Counties. Its affiliate, Newlin Mortgage Company, originates and services residential and commercial loans for approximately 300 investors throughout the United States through three branch offices in the Fort Worth area, four branch offices in the Dallas area, and two branch offices in Houston.

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PROGRESS REPORT

Attachment 12
(page 4 of 6)

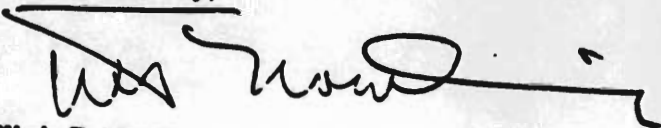
This report is for an abbreviated period of only six months (ending December 31, 1982) due to our plan to make future financial reports on a calendar year basis. Consequently, our next statement will be submitted to you for the full year ending December 31, 1983.

We are hopeful that the long awaited revival of the housing industry has begun. The half year period we have just closed has resulted in record production, both residential and commercial, excellent profits, and substantial growth in the size of our servicing portfolio. We have also made significant additions to our staff.

Our new parent, Nowlin Savings, continues to present opportunities for expanded services and profit. As we further develop these synergistic capabilities, new horizons make possible greater services to our borrowers and investors.

For the full year 1983, we are optimistic that the economy will permit a healthy period for Nowlin Savings/Nowlin Mortgage.

Yours very truly,


Wade T. Nowlin
Chairman of the Board


H. Campbell Wood
President

NOWLIN SAVINGS ASSOCIATION NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

NOTE 1 — Summary of Significant Accounting Policies:

Principles of Consolidation

During 1982, a business combination between Nowlin Mortgage Company and Cross Timbers Savings and Loan Association was consummated (see Note 2). Subsequent to this acquisition the name of Cross Timbers Savings and Loan Association was changed to Nowlin Savings Association. For the year ended June 30, 1982, these financial statements include the operations of Nowlin Mortgage Company and its wholly-owned subsidiary, Metroplex Mortgage Company for the twelve-month period, and the operations of Nowlin Savings Association for the three-month period then ended. For the six months ended December 31, 1982, the financial statements include the accounts of Nowlin Savings Association and its wholly-owned subsidiary, Nowlin Mortgage Company. Inter-company balances, transactions, and ownership have been eliminated in consolidation.

Loans Held for Sale

Mortgage loans are recorded in inventory when funds are disbursed to acquire the loan. The inventory of mortgage loans held for sale in the normal course of business is stated at the lower of cost or market. In determining market value, consideration is given to commitments on hand from investors and prevailing market prices. As appropriate, the association hedges mortgage loans held for sale by taking positions in the futures market opposite to its positions in the cash market, in order to shift the risk of significant market fluctuations to speculators. Transactions involving futures market contracts are used in computations of lower cost or market for mortgage loans held for sale. Provision for potential future losses due to decline in market value is calculated on the aggregate inventory basis and is charged to income.

Premises and Equipment

All premises and equipment are recorded at cost and depreciated on a straight-line basis over the expected useful lives of the assets. Expenditures for normal maintenance and repairs are charged to income, and significant improvements are capitalized. Cost of assets sold or abandoned and the related accumulated depreciation are eliminated from the accounts and the net amount, less proceeds from disposal, is charged or credited to income.

Amortization of Cost of Acquired Servicing

Certain costs have been deferred by Nowlin Mortgage Company associated with bulk purchases of mortgages. The purchase and resale of mortgages is a transaction similar to the purchase of mortgage servicing contracts and, accordingly, costs have been deferred which are not in excess of amounts recoverable from future servicing revenue. In addition, certain costs have been deferred by the company which represent the purchase price of portfolios acquired from others allocated to future income to be derived from servicing such portfolios. These costs are being amortized over periods not exceeding ten years.

Other Income Recognition Policies

Residential loan origination fees are recorded as income upon collection at loan settlement. Placement fees are recognized as earned at the time loan commitments have been obtained and accepted.

Fees paid to investors for residential loan commitments are expensed as the commitment is filled or upon expiration of the commitment.

Intangible Assets Arising From Acquisitions (See Note 2)

The excess of the purchase price paid over the net assets acquired is being amortized over periods of 12 and 40 years. Amortization is by both the straight-line and interest method and is based upon the association's productive assets acquired (see Note 6).

NOWLIN SAVINGS ASSOCIATION NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Federal Income Taxes

The association is allowed a bad debt deduction subject to certain limitations based upon aggregate loans and savings account balances at the end of the year. If the amounts that qualify as deductions for federal income tax purposes are later used for purposes other than bad debt losses, they will be subject to federal income tax at the then current corporate rate. Because the association does not intend to use the reserve for purposes other than to absorb losses, no deferred income taxes have been provided and, thus, the income tax provision is substantially less than the amount computed by applying statutory income tax rates. Deferred federal income taxes result principally from timing differences between financial and tax reporting purposes for:

- Adjustments to the cash basis for tax purposes
- Net gains or losses on sale of loan participations recognized differently for financial and tax reporting purposes

The association uses the flow-through method to account for the investment tax credit.

Earnings Per Share

Earnings per share are based on the average number of common shares outstanding.

NOTE 2 — Acquisition

Effective April 1, 1982, a business combination was consummated whereby the shareholders of Nowlin Mortgage Company became the shareholders of Cross Timbers Savings and Loan Association and the savings and loan association became the parent of Nowlin Mortgage Company. For financial statement purposes, the acquisition has been accounted for under the purchase method.

The net purchase price of \$800,000 has been allocated to the fair value of net assets acquired and the excess of the purchase price over the fair value of the net assets acquired is being amortized based on the method described in Note 1.

Pro forma financial information has been

prepared in accordance with Accounting Principle Board Opinion No. 16 and is based on the assumption that Nowlin Savings Association was acquired as of July 1, 1981, at the same purchase price.

Thousands of Dollars, Except Per Share Data

Year Ended
June 30, 1982

Total revenues	\$11,900
Net income	\$ 1,780
Net income per share	\$.9321

NOTE 3 — Other Loans

Other loans at December 31, 1981 are summarized as follows:

First mortgage loans	\$50,447,243
Construction loans	1,179,180
Notes receivable	185,883
Consumer loans	571,747
Loans secured by savings deposits	412,084
	<u>\$52,805,637</u>

Less:

Participations sold	45,301,857
Unearned discounts	189,574
Loans in process	129,148
	<u>\$ 7,205,058</u>

NOTE 4 — Federal Home Loan Bank and Federal National Mortgage Association Stock

The association is required to own stock in the Federal Home Loan Bank (FHLB) and the Federal National Mortgage Association (FNMA). At December 31, 1982, the association owned 1,900 shares of FHLB and 27,010 shares of FNMA stock. These shares of stock had market values of \$190,000 and \$661,745, respectively.

NOTE 5 — Premises and Equipment

At December 31, 1982, premises and equipment consisted of the following:

Land	\$ 175,718
Building and building improvements	893,559
Furniture, fixtures and equipment	1,007,499
	<u>1,876,776</u>
Accumulated depreciation	<u>610,532</u>
	<u>\$1,266,244</u>

MUR 2158

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) RAD Ref. 85L-38
Nowlin Savings/Nowlin Mortgage)
Political Action Committee)
B. Larry Johnson, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 28, 1986, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 85L-38:

1. Open a MUR.
2. Find reason to believe that the Nowlin Savings/Nowlin Mortgage Political Action Committee and B. Larry Johnson, as treasurer, violated 11 C.F.R. § 102.5(a).
3. Approve and send the letter and legal and factual analysis, as recommended in the First General Counsel's Report signed March 24, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively for this decision.

Attest:

3-31-86

Date

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

Received in Office of Commission Secretary:	Tues., 3-25-86,	9:34
Circulated on 48 hour tally basis:	Tues., 3-25-86,	4:00
Deadline for vote:	Thurs., 3-27-86,	4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

April 1, 1986

B. Larry Johnson, Treasurer
NOWPAC
2821 Lackland Road
Fort Worth, Texas 76116

RE: MUR 2158
Nowlin Savings/Nowlin
Mortgage Political Action
Committee, B. Larry Johnson,
Treasurer

Dear Mr. Johnson:

On March 28, 1986, the Federal Election Commission determined that there is reason to believe the Nowlin Savings/Nowlin Mortgage Political Action Committee and you, as treasurer, violated 11 C.F.R. § 102.5(a), by accepting transfers totalling \$13,950 from its State account. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. 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 fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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

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Page 2

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact John Drury, the staff member to whom this matter has been assigned, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Joan D. Aikens
Chairman

Enclosures

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

pr/iv

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FEDERAL BUREAU OF INVESTIGATION
400 E Street, N.W.
Washington, D.C. 20535

SENSITIVE

DATE AND TIME OF TRANSMISSION: MAR 25 1984 18:34

DATE AND TIME OF TRANSMISSION
BY OGC TO THE COMMISSION

NO. REFERENCE: 85L-38
STAFF NUMBER: 374-0100

SOURCE OF INFORMATION: INTERNALLY GENERATED

RESPONDENT'S NAME: Nowlin Savings/Nowlin Mortgage
Political Action Committee
B. Larry Johnson, Treasurer

RELEVANT STATUTES: 11 C.F.R. § 102.5(a)

INTERNAL REPORTS

CHECKED: FEC Disclosure Documents; AO 1984-31; "G"
Index

FEDERAL AGENCIES

CHECKED: N/A

GENERATION OF MATTER

The Nowlin Saving/Nowlin Mortgage Political Action Committee ("NowPAC") and B. Larry Johnson, as treasurer, were referred to the Office of General Counsel by the Reports Analysis Division for accepting funds from its non-Federal account ("State PAC") during 1984.

SUMMARY OF ALLEGATIONS

NowPAC is an unauthorized political committee established by Nowlin Mortgage Company ("NMC") and its parent company, Nowlin Savings Association ("NSA") in early 1983. In addition to NowPAC, NSA and NMC also established State-PAC as its non-federal account.

In its 1984 April Quarterly Report, NowPAC disclosed the receipt of \$3,000 on March 13, 1984. An additional \$10,950

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transfer was reported on its 1984 July Quarterly Report. On May 8, 1985, an NFAI was sent to NowPAC which, in part, requested that the committee clarify whether the \$13,950 in transfers were made from an account maintained for non-federal activity. NowPAC was advised that such activity was prohibited by 11 C.F.R. § 102.3 and, if this was the case, the full amount should be returned to the non-federal account. A second NFAI was sent on May 30, 1985.

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In a written response on June 4, 1985, Mr. Larry Johnson, NowPAC's treasurer, explained that NSA and NSC established both a federal PAC (National NowPAC) and State PAC (NowPAC) in early 1983. Contributions to both PACs were received solely from the directors and officers of NSA and NSC. In June of 1984, however, a decision was made to consolidate both committees and to file reports with both the Secretary of State of Texas and the Commission. The resulting PAC became known only as NowPAC. In addition to his explanation, Mr. Johnson provided the Commission with a list of contributors dating from early 1983 through June 20, 1984, the merger date.^{1/}

Mr. Johnson was again contacted by a RAD analyst on July 1, 1985, to determine whether the contributors to State PAC had authorized the transfer of their funds to the federal PAC per

^{1/} Although NowPAC also received funds from State PAC in 1983, only the 1984 activity met the threshold of RAD Review and Referral Procedures for Unauthorized Committees.

the guidelines established by AO 1984-31.^{2/} The appropriate information, including a copy of AO 1984-31 was forwarded to Mr. Johnson to assist in preparing his response.

In his response to the Commission on July 22, 1985, Mr. Johnson explained that the sole purpose in combining the PACs was to ease administrative burden. Further, he advised that a resolution was passed by the corporation's Board of Directors on April 18, 1984, authorizing management to combine the committees. Included with his letter was a Certification of Corporate Resolution and supporting receipt schedules disclosing the contributors to the State PAC.

As of this date, NowPAC has failed to dispose of the funds received from its State PAC.

LEGAL AND FACTUAL ANALYSIS

Pursuant to 11 C.F.R. § 102.5(a), a committee which finances political activity in connection with both federal and non-federal elections shall only deposit funds subject to the prohibitions and limitations of the Act into its federal account. Further, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections.

^{2/} AO 1984-31 involves a request for guidance by the First Bank and Trust Company of Booker, Texas regarding a proposed transfer of funds to a separate, segregated fund established by the Bank. The AO provides, in part, that contributors to the State PAC must provide written authorization for their contributions to be used for the purpose of influencing federal elections for the transfer to be permissible.

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1982

The Commission determined, in Advisory Opinion 1984-31, that when a corporation has an already established federal PAC, the State PAC may act as a collecting agent pursuant to Commission regulations at 11 C.F.R. §§ 102.6(b) and (c). The transfer may be permissible through the State account (without the State committee becoming a political committee subject to the Commission's registering and reporting requirements) providing certain conditions are met. In order to make such a transfer, the State PAC is required to obtain written authorizations from each contributor to the State PAC stating their intent in making a contribution to the Federal account. (See 11 C.F.R. § 102.6(b) and (c) and 114.5). Each contribution included in the amount transferred must be reported by the federal PAC as a contribution from the original contributor. Conversely, any contributor who does not so state, must either be given a refund or the contribution must remain in the State account.

Although NowPAC reported and documented all funds involved in the combined \$13,950 transfer from State PAC to NowPAC as contributions from directors and senior officers of NSA and NNC, except for a copy of the Certified Resolution of the NSA Board, Meeting of April 18, 1984, (which authorized management to consolidate the accounts), NowPAC has provided no written documentation from any of the contributors acknowledging their intent in making a contribution to the federal account, nor has

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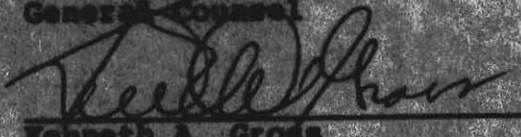
NowPAC refunded these contributions.^{3/} Thus, it appears respondents violated 11 C.F.R. § 102.5 by accepting \$13,958 in transfers from its State PAC.

1. Open a NUR.
2. Find reason to believe that the Nowlin Savings/Nowlin Mortgage Political Action Committee and B. Larry Johnson, as treasurer, violated 11 C.F.R. § 102.5(a)
3. Approve and send the attached letter and legal and factual analysis.

Charles B. Steele
General Counsel

March 24, 1986

BY:


Kenneth A. Gross
Associate General Counsel

Attachments:

Referral

AO 1984-31

Proposed letter and legal and factual analysis

^{3/} There appears to be no violation of 2 U.S.C. § 441b since Texas State law does not permit contributions by corporations or labor unions.

jd/iv

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 3, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF NOWLIN SAVINGS/NOWLIN MORTGAGE
POLITICAL ACTION COMMITTEE

This is a referral of the Nowlin Savings/Nowlin Mortgage Political Action Committee ("NowPAC") for receiving funds from its non-Federal account ("the State PAC") during 1984. Although NowPAC also received funds from the State PAC in 1983, only the 1984 activity meets the threshold of the RAD Review and Referral Procedures for Unauthorized Committees (Standard 7).

For your information, none of the funds in question have been transferred-out. Rather, NowPAC has explained that the two accounts were combined to ease the administrative burden. The action was taken based upon a resolution approved by Nowlin Savings Association's Board of Directors. According to NowPAC's treasurer, the funds in the State PAC were comprised of contributions collected only from the officers and directors of Nowlin Savings Association and Nowlin Mortgage Company.

If you have any questions on this matter, please contact J. Hunter Bryan at 523-4048.

Attachment

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: September 3, 1985ANALYST: J. Hunter Bryan

I. COMMITTEE: Nowlin Savings/Nowlin Mortgage Political
Action Committee (C00169219)
B. Larry Johnson, Treasurer
2821 Lackland Road
Fort Worth, TX 76116

II. RELEVANT STATUTE: 11 CFR 102.5(a)

III. BACKGROUND:

Receipt of Funds From a Non-Federal Account

Nowlin Savings/Nowlin Mortgage Political Action Committee ("NowPAC") disclosed receipts totalling \$13,950 from its non-Federal account ("the State PAC") in 1984. The 1984 April Quarterly Report disclosed a receipt of \$3,000 on March 13, 1984 (Attachment 2). The 1984 July Quarterly Report disclosed another receipt of \$10,950 on June 18, 1984 (Attachment 3).

A Request for Additional Information ("RFAI") was sent to NowPAC on May 8, 1985 asking the committee to clarify whether the transfers were made from an account maintained for non-Federal activity (Attachment 4). NowPAC was advised that such activity is prohibited by 11 CFR 102.5, and the full amount of the transfers should be returned to the non-Federal account.

Mr. B. Larry Johnson, the treasurer of NowPAC, called the Commission on May 21, 1985 to discuss the RFAI. Mr. Johnson indicated that there had been a consolidation of the two PACs (Attachment 5). The Reports Analysis Division ("RAD") analyst asked Mr. Johnson to respond in writing and to provide documentation of the source of funds. Since NowPAC failed to submit the requested information, a Second Notice was sent on May 30, 1985 (Attachment 6).

Mr. Johnson submitted a letter of explanation, which was received at the Commission on June 10, 1985 (Attachment 7). According to Mr. Johnson's response, Nowlin Savings

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HOWLIN SVINGS/HOWLIN MORTGAGE
POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC MEMORANDUM
PAGE 2

Association and Howlin Mortgage Company established two political action committees ("PACs") in early 1983.^{*/} One PAC was for state and local purposes, and the other was for "national purposes." Contributions to the two PACs were received from the directors and officers of the above two companies. In June of 1984, however, a decision was made to consolidate the two PACs. Although Mr. Johnson did not explain the reason for merging the committees, he did provide a listing of the contributors from "... early 1983 to the merger date on June 20, 1984."

The RAD analyst called Mr. Johnson on July 1, 1985 to ask whether the contributors to the State PAC had authorized the transfer of funds to the Federal PAC. The RAD analyst informed Mr. Johnson that he would send the regulations and a copy of Advisory Opinion 1984-31 for his reference (Attachment 8).

On July 19, 1985, the RAD analyst phoned Mr. Johnson to request a written explanation on the manner in which the decision to consolidate the two PACs was made (Attachment 9). In addition, the RAD analyst informed Mr. Johnson that even if the transfers were made in accordance with the guidelines of AO 1984-31, the activity may not be permissible.

In response to the telephone conversation, Mr. Johnson submitted a letter of explanation on July 23, 1985 (Attachment 10). The letter stated that "... the sole purpose of combining the PACs was to ease the administrative burden." A resolution was passed by the corporation's Board of Directors on April 18, 1984 authorizing management to combine the committees. Included with Mr. Johnson's letter was a Certification of Corporate Resolution and supporting receipt schedules disclosing the contributors to the State PAC.

^{*/} On August 26, 1985 the RAD analyst called Mr. Johnson to request an explanation of the relationship between Howlin Savings Association ("NSA") and Howlin Mortgage Company ("HMC"). Mr. Johnson stated that the shareholders of HMC bought NSA and made NSA the parent organization (Attachment 11). Mr. Johnson submitted a letter on August 28, 1985 which stated "... effective April 1, 1982, the shareholders of HMC became the shareholders of NSA.... Thereby, HMC was a subsidiary of NSA." He also provided a copy of their 1982 Annual Report for background information (Attachment 12).

1982

UNITED STATES OF AMERICA
DEPARTMENT OF THE TREASURY
BUREAU OF INTERNAL REVENUE

By this return the taxpayer certifies that the income reported
hereon is correct.

27. OTHER PAYMENTS RECEIVED (SEE INSTRUCTIONS)

None.

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1982

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	0 02 PAGE	REMARKS LOCATION
NOWPAC (FORMERLY NATIONAL NOWPAC) CONNECTED ORGANIZATION: NOWPAC						
1983 STATEMENT OF ORGANIZATION						
	YEAR-END	1,000	200	0AUG83	2	0000/000/0000
	YEAR-END - AMENDMENT	-	-	2AUG83 - 31DEC83	2	0000/000/0000
	YEAR-END - AMENDMENT	-	-	2AUG83 - 31DEC83	4	0000/000/0000
	REQUEST FOR ADDITIONAL INFORMATION	-	-	2AUG83 - 31DEC83	14	0000/000/0000
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	2AUG83 - 31DEC83	5	0000/000/0000
1984 STATEMENT OF ORGANIZATION - AMENDMENT						
	MISCELLANEOUS REPORT			2AUG83 - 31DEC83	6	0000/000/0000
	APRIL QUARTERLY	3,000	3,500	16APR84 TO DEC	3	0000/000/0000
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 - 31MAR84	4	0000/000/0000
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 - 31MAR84	1	0000/000/0000
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JAN84 - 31MAR84	1	0000/000/0000
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1JAN84 - 31MAR84	1	0000/000/0000
	JULY QUARTERLY	0	300	1APR84 - 30JUN84	1	0000/000/0000
	JULY QUARTERLY - AMENDMENT	10,950	1,300	1APR84 - 30JUN84	1	0000/000/0000
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 - 30JUN84	1	0000/000/0000
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 - 30JUN84	1	0000/000/0000
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1APR84 - 30JUN84	1	0000/000/0000
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1APR84 - 30JUN84	1	0000/000/0000
	OCTOBER QUARTERLY	500	3,850	1JUL84 - 30SEP84	1	0000/000/0000
	1-ST LETTER INFORMATIONAL NOTICE	-	-	1JUL84 - 30SEP84	1	0000/000/0000
	PRE-GENERAL	0	3,550	1OCT84 - 17OCT84	1	0000/000/0000
	PRE-GENERAL - AMENDMENT	0	3,550	1OCT84 - 17OCT84	1	0000/000/0000
	POST-GENERAL	0	1,410	1OCT84 - 17OCT84	1	0000/000/0000
	YEAR-END	2,000	500	27NOV84 - 31DEC84	1	0000/000/0000
	YEAR-END - AMENDMENT	2,000	500	27NOV84 - 31DEC84	1	0000/000/0000
1985 REQUEST FOR ADDITIONAL INFORMATION						
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	27NOV84 - 31DEC84	1	0000/000/0000
TOTAL		17,450	0 14,310	0	100	TOTAL PAGE

All reports reviewed.
Ending Cash (12/31/84): \$3,140
No debts owed to/by.

Attachment 1
(Page 1 of 2)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILED COVERAGE DATES	# OF PAGES	MICROFILM LOCATION

NOWLIN SAVINGS/NOWLIN MORTGAGE POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: NOWLIN SAVINGS ASSOCIATION (NSA)				NON-PARTY NON-QUALIFIED ID 0C00169219		
1985 MISCELLANEOUS REPORT				5FEB85 TO FEC	2	85FEC/365/0203
STATEMENT OF ORGANIZATION - AMENDMENT				22FEB85	2	85FEC/366/4341
STATEMENT OF ORGANIZATION - AMENDMENT				28AUG85	6	85FEC/366/4993
FEBRUARY MONTHLY 2,000				1JAN85 - 31JAN85	5	85FEC/366/1813
MARCH MONTHLY 1,662				1FEB85 - 28FEB85	5	85FEC/366/4084
APRIL MONTHLY 4,200				1MAR85 - 31MAR85	5	85FEC/371/1886
MAY MONTHLY 1,800				1APR85 - 30APR85	5	85FEC/374/0615
JUNE MONTHLY 500				1MAY85 - 31MAY85	5	85FEC/376/0681
JULY MONTHLY 2,500				1JUN85 - 30JUN85	4	85FEC/383/1146
AUGUST MONTHLY 0				1JUL85 - 31JUL85	5	85FEC/386/0671
TOTAL 12,662				0 9,600	0	44 TOTAL PAGES

No reports reviewed.
 Ending Cash (7/31/85): \$6,202
 No debts owed to/by.

Attachment 2
1984 April Quarterly Report

CHRONOLOGICAL

STANDARD RECEIPTS

Receipts for
the period from
the beginning of the
quarter to the
end of the quarter
(Quarterly Report)

NATIONAL BUREAU OF FIREARMS			
Any information entered here and elsewhere on this form may be used or made available to the public for the purpose of identifying individuals or for other purposes, and the user of this information is advised that it is not to be used for any other purpose.			
1. Name, Address and ZIP Code RECEIPT 3021 Lockland Road Fort Worth, Texas 76116		Date of Receipt 3-13-84	Amount of Cash Received This Period 3,000.00 <i>JB</i>
Receipt For: ☐ Primary ☐ General ☐ Other (specify)		Aggregate Year-to-Date - 1	
2. Full Name, Mailing Address and ZIP Code		Date of Receipt	Amount of Cash Received This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)		Aggregate Year-to-Date - 2	
3. Full Name, Mailing Address and ZIP Code		Date of Receipt	Amount of Cash Received This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)		Aggregate Year-to-Date - 3	
4. Full Name, Mailing Address and ZIP Code		Date of Receipt	Amount of Cash Received This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)		Aggregate Year-to-Date - 4	
5. Full Name, Mailing Address and ZIP Code		Date of Receipt	Amount of Cash Received This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)		Aggregate Year-to-Date - 5	
6. Full Name, Mailing Address and ZIP Code		Date of Receipt	Amount of Cash Received This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)		Aggregate Year-to-Date - 6	
7. Full Name, Mailing Address and ZIP Code		Date of Receipt	Amount of Cash Received This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)		Aggregate Year-to-Date - 7	
8. Full Name, Mailing Address and ZIP Code		Date of Receipt	Amount of Cash Received This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)		Aggregate Year-to-Date - 8	
9. Full Name, Mailing Address and ZIP Code		Date of Receipt	Amount of Cash Received This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)		Aggregate Year-to-Date - 9	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (fill in page and line number only)			

85040514101

81033141370

Attachment 3
1994 July Quarterly Report

SECRET

UNITED STATES

THE UNIVERSITY OF THE STATE OF NEW YORK
THE STATE EDUCATION DEPARTMENT
(THE UNIVERSITY OF THE STATE OF NEW YORK)

Name (Formerly NATIONAL BANCORP)		Date of Birth	Date of Death	Age at Death
A. Full Name, Working Address and ZIP Code		7-1981-17	6-18-84	10,950.00
B. Full Name, Working Address and ZIP Code				
C. Full Name, Working Address and ZIP Code				
D. Full Name, Working Address and ZIP Code				
E. Full Name, Working Address and ZIP Code				
F. Full Name, Working Address and ZIP Code				
G. Full Name, Working Address and ZIP Code				
H. Full Name, Working Address and ZIP Code				
I. Full Name, Working Address and ZIP Code				
J. Full Name, Working Address and ZIP Code				
K. Full Name, Working Address and ZIP Code				
L. Full Name, Working Address and ZIP Code				
M. Full Name, Working Address and ZIP Code				
N. Full Name, Working Address and ZIP Code				
O. Full Name, Working Address and ZIP Code				
P. Full Name, Working Address and ZIP Code				
Q. Full Name, Working Address and ZIP Code				
R. Full Name, Working Address and ZIP Code				
S. Full Name, Working Address and ZIP Code				
T. Full Name, Working Address and ZIP Code				
U. Full Name, Working Address and ZIP Code				
V. Full Name, Working Address and ZIP Code				
W. Full Name, Working Address and ZIP Code				
X. Full Name, Working Address and ZIP Code				
Y. Full Name, Working Address and ZIP Code				
Z. Full Name, Working Address and ZIP Code				



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

22-2

B. Larry Johnson, Treasurer
Howlin Savings/Howlin Mortgage
Political Action Committee
3021 Lackland Road
Fort Worth, TX 76116

NY 8 885

Identification Number: C00169219

Reference: Year End (8/31/83-12/31/83), April Quarterly (1/1/84-3/31/84), and July Quarterly (4/1/84-6/30/84) Reports

Dear Mr. Johnson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your reports discloses receipts from NOWPAC (pertinent portions attached). Please clarify whether these transfers are from an account maintained by your committee for non-Federal activity. If so, be advised that such transfers are prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfers should be returned to the non-Federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfers-out. In addition, the transfers-out should be disclosed on a supporting Schedule B for Line 27 of your next report.

If, however, these transactions represent an "internal transfer" of funds from one Federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your reports accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-Federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 426-6979. My local number is (202) 523-4048.

Sincerely,

J. Hunter Bryan

J. Hunter Bryan
Reports Analyst
Reports Analysis Division

95033730236

TELECOM

ANALYST: Bryan

CONVERSATION WITH: B. Larry Johnson

COMMITTEE: NowPAC

DATE: 5/21/85

SUBJECT(S):

Mr. Johnson called to discuss the May B-RFAL. Specifically, he explained the decision to consolidate the two PACs. The RAD analyst asked Mr. Johnson to respond in writing and also to provide documentation of the source of funds.

86040614105



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

RG-3

May 30, 1985

B. Larry Johnson, Treasurer
Howlin Savings/Howlin Mortgage
Political Action Committee
2821 Lackland Road
Fort Worth, TX 76116

Identification Number: C88169219

Reference: 1983 Year-End (8/2/83-12/31/83), 1984 April Quarterly
(1/1/84-3/31/84), and 1984 July Quarterly (4/1/84-
6/30/84) Reports

Dear Mr. Johnson:

This letter is to inform you that as of May 29, 1985, the Commission has not received your response to our request for additional information, dated May 8, 1985. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Hunter Bryan on our toll-free number (800) 424-9530 or our local number (202) 523-4040.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

NEWLIN SAVINGS

16 JUN 68 48:28

Attachment 7
(page 1 of 4)

June 4, 1968

Mr. J. Hunter Bryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Identification Number: C80169219

Dear Mr. Bryan:

Your letter of May 8, 1968 requested clarification of transfers into the "National Nonpac" account from the "Nonpac" account on the following dates and in the amounts indicated:

10-11-63	\$ 1,888.00
3-13-64	3,888.00
6-18-64	18,750.00

In early 1963, Newlin Savings Association and Newlin Mortgage Company established two PAC's. NONPAC was to be used for state and local purposes; NATIONAL NONPAC was to be used for national purposes. These PAC's were funded by the directors and officers of the above two companies.

In June 1964, it was decided to consolidate the two PAC's and from then on, report to the FEC and the Secretary of State of Texas. Attached is a copy of a letter we forwarded in this regard. JB

On May 21, 1964, we discussed this matter and you requested that we forward a detailed listing of the contributors to the PAC's from its inception in early 1963 to the merger date on June 20, 1964. Attached is this listing that shows the contributor, date and amount. As previously stated, all named individuals were either officers or directors of Newlin Savings Association or Newlin Mortgage Company. JB

If you have any further questions or desire any additional information, please contact me (817-735-0715).

Sincerely yours,

B. Larry Johnson
B. Larry Johnson
Treasurer, NONPAC

BLJ/cs

Enclosures

Primary Election (NRPAC)
NRPAC
P.O. Box 100
Fort Worth, Texas 76101

October 10, 1984

Federal Election Commission
1205 E Street, N.W.
Washington, D.C. 20543

To Hon. R. Ray Cannon

Before June 10, 1984, these entities had files with the above address:

State	Local	Federal
• National NRPAC	For the Federal Elections	Federal Election Commission
• NRPAC	For the Local & State (Texas) Elections	Secretary of State State of Texas

On June 10, 1984, NRPAC was merged into National NRPAC. The name of National NRPAC was changed to NRPAC. The merged NRPAC will continue to make contributions to candidates for Federal, State and Local campaigns. The details of such activities will be reported to the appropriate legislators in accordance with their rules and regulations.

Baker John
B. Lacy
Treasurer
NRPAC

EXPENSES

H. C. Wood
Wade T. Mauldin, Jr.
James F. Buchanan
Sam E. Ray
Jack York
G. Jack Wiley
Wade T. Mauldin
Georgia Hill
Susan Forester
Phillip Ashen
Lonny Coffey
H. Rob Frenzel
John Smith
William E. Henshaw
Martin Hagan
John E. Driscoll, Sr.
Jim Withers
J. Ray Taylor
Allen Jones
H. L. Haskins
H. Rob Frenzel
G. Jack Wiley
H. C. Wood
Kenneth Garrett
H. Rob Frenzel
H. C. Wood
William E. Henshaw
G. Jack Wiley
H. Rob Frenzel
H. Rob Frenzel

Total—1963

\$14,330

RECEIPTS—1964

Wade T. Mauldin
G. Jack Wiley
Richard Driscoll
Phillip Ashen
James F. Buchanan
Lonny Coffey

2,000
1,000
1,000
1,000
1,000
1,000

3/26
3/28
4/3
5/10

RECEIPTS--1984 (cont'd)

DATE	NAME	AMOUNT
5/8	Sam R. Day	1,200
	William E. Henshaw	1,200
	Susan Fervino	1,200
	H. Rob Fernald	1,200
	Kenneth Gervitt	1,200
	Georgia Hill	1,200
	B. Larry Johnson	1,200
	Allen Jones	1,200
	Walter H. Mullin, Jr.	1,200
	Martin Morgan	1,200
	Wade Newlin, Jr.	1,200
	Douglas H. Foster	1,200
	John Smith	1,200
	J. Ray Taylor	1,200
	G. Jack Wiley	1,200
	Jack York	1,200
5/8	John E. Griswold, Jr.	1,200
6/18	Deposit from National NRPAC (to close account)	1,200
	Total--1984 (to 6/28/84)	\$14,325
	Total--1983	\$14,325
	Total--1984 (to 6/28/84)	14,325
	Total--1983 & 1984	\$28,675
	Less Various Contributions-- (PACs, State, Federal, Local)	
	1983 \$ 9,275	
	1984 8,450	
		\$17,725
	Balance--6/28/84	\$10,950

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

B. Larry Johnson
B. Larry Johnson
Treasurer

6-5-85
Date

TELECON

ANALYST : HUNTER BRYAN
CONVERSATION WITH : B. LARRY JOHNSON
COMMITTEE : NowPAC
DATE : July 1, 1985
SUBJECT : CLARIFICATION OF TRANSFERS
FROM STATE PAC

I called Mr. Johnson to request additional information concerning the transfers from the State PAC. I explained that unless the contributors to the State PAC had provided written authorization for their contributions to be used for the purpose of influencing Federal elections (per the guidelines of AO 1984-31), the transfer may be impermissible.

Appropriate information (i.e., the regulations and a copy of AO 1984-31) was sent in order to assist Mr. Johnson in preparing his response.

86040314111

TELECON

ANALYST : HUNTER BRYAN
CONVERSATION WITH : B. LARRY JOHNSON
COMMITTEE : NowPAC
DATE : JULY 19, 1985
SUBJECT : ADDITIONAL BACKGROUND ON THE TRANSFERS
FROM THE STATE PAC

I called Mr. Johnson to find out if he had received the information mailed on July 1, 1985. I asked if he understood the advisory opinion, and explained that even if the transfers were made according to the guidelines of AO 1984-31, it would not necessarily mean that the activity was permissible.

I informed Mr. Johnson that any information that he could provide would be helpful. I specifically requested that the source of funds be itemized on a supporting receipt schedule and that an explanation be provided concerning the decision to consolidate the two PACs.

86040614112

HOWLIN MORTGAGE

RECEIVED
15 JUL 23 4:00
FEC

July 22, 1983

Attachment 10
(page 1 of 9)

Mr. J. Hunter Bryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K. Street, N.W.
Washington, D. C. 20463

Dear Mr. Bryan:

For our convenience, enclosed are original Schedule A's for 1983 and the period ended June 30, 1984 when the funds were combined. Refer to my letter of June 4, 1983 for a detailed description of this merging of PAC bank accounts.

Enclosed is a Certified Resolution of Howlin Savings Association Board dated April 22, 1983 that authorized management to combine the accounts.

As I had previously indicated, we solicit contributions only from senior officers and directors. All of these are also shareholders. At each shareholders' annual meeting (held in April each year) it is the practice of the Chairman of the Board to advise the activity of the PAC with the shareholders. This review would disclose the beginning balance of the PAC, receipts for the year, a detailed description of the contributions were made to (i.e., state, office seeking, state or federal), aggregate disbursements and ending balance.

As I have indicated, the sole purpose of combining the PACs was to ease the administrative burden. We fully intended and have reported all receipts and disbursements (whether state or federal), to both the Secretary of the State of Texas and the Federal Election Commission. However, we totally overlooked the source of the funds transferred on June 30, 1984. I hope with my letter of June 4, 1983 and this, we have corrected this oversight.

If you need any additional information, do not hesitate to contact me.

Sincerely yours,

Bobby John

B. Larry Brown
Treasurer

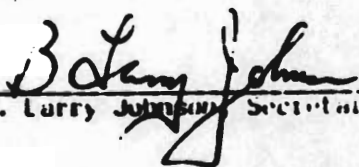
Howlin Mortgage/Howlin Savings PAC

CERTIFICATION OF CORPORATE RESOLUTION

I, B. Larry Johnson, being the duly constituted Executive Vice President and Secretary of Franklin Savings Association, a corporation organized and existing under and by virtue of the laws of the State of Texas (hereinafter called this corporation), do hereby certify that the following is a true and complete copy of a Resolution duly adopted at the meeting of the Board of Directors of this corporation duly called and held on April 18, 1984, at which a quorum was present and voting; that said Resolution is still in full force and effect and has not been rescinded; and that said Resolution is not in conflict with the Charter or Bylaws of this corporation:

RESOLVED, That the Board of Directors of the Company authorize management to combine the Federal PAC and the State PAC and to make appropriate filings with the Federal Elections Commission and the Secretary of the State of Texas.

IN WITNESS WHEREOF I HAVE HEREUNTO SET MY HAND AND THE SEAL OF THIS CORPORATION THIS 1ST DAY OF JULY, 1985


B. Larry Johnson Secretary

SCHEDULE C

Attachment 10
(page 3 of 9)

Any information reported from your Form 990 or Schedule C may not be paid or used for any other purpose, other than using the same for purposes of any political contribution to select committees from such committee.

Name of Committee to Fund:

A. Full Name, Mailing Address and ZIP Code B. C. Ward 6805 River Bend Fort Worth, TX 76132 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn./ Nowlin Mortgage Co. Occupation President Aggregate Year-to-Date - \$ 1,500.00	Date (month, day, year) 4/4/83 8/27/83 11/3/83	Amount of Each Receipt This Period 500.00 500.00 500.00
B. Full Name, Mailing Address and ZIP Code Wales Madden, Jr. 2701 Fiddle Amarillo, TX 79106 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Director Aggregate Year-to-Date - \$ 500.00	Date (month, day, year) 4/20/83	Amount of Each Receipt This Period 500.00
C. Full Name, Mailing Address and ZIP Code James F. Beckman 1901 Indian-Cross Dr. Fort Worth, TX 76107 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Director Aggregate Year-to-Date - \$ 500.00	Date (month, day, year) 4/25/83	Amount of Each Receipt This Period 500.00
D. Full Name, Mailing Address and ZIP Code Sam R. Day 2309 Madford Ct. E Fort Worth, TX 76109 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Director Aggregate Year-to-Date - \$ 500.00	Date (month, day, year) 4/28/83	Amount of Each Receipt This Period 500.00
E. Full Name, Mailing Address and ZIP Code Jack H. York 3424 Hilldale Fort Worth, TX 76107 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Director Aggregate Year-to-Date - \$ 500.00	Date (month, day, year) 4/29/83	Amount of Each Receipt This Period 500.00
F. Full Name, Mailing Address and ZIP Code G. Jack Wiley 705 Chaffee Ct Arlington, TX 76011 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Company Occupation Executive VP Aggregate Year-to-Date - \$ 1,500.00	Date (month, day, year) 5/4/83	Amount of Each Receipt This Period 500.00
G. Full Name, Mailing Address and ZIP Code Wade T. Nowlin 510 Hazlewood Fort Worth, TX 76107 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Nowlin Mortgage Co. Occupation Chairman Aggregate Year-to-Date - \$ 2,000.00	Date (month, day, year) 5/5/83	Amount of Each Receipt This Period 2,000.00
SUBTOTAL of Receipts This Page (include all)			
TOTAL This Period (last page this line number only)			

SCHEDULE A

Attachment 10
(page 4 of 9)

Any information shown here with respect to the above information may not be used or relied on for the purpose of obtaining contributions or for any other purpose, unless such information is shown in the original form or in a copy of the original form which is certified to be a true and correct copy of the original form.

A. Full Name, Mailing Address and ZIP Code Georgia B. Hill 4216 Richover Dr. Dallas, TX 75244 Recruit For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Marlin Mortgage Co. Occupation Vice President Appropriate Year-to-Date \$ 1,000.00	Date (month, day, year) 5/24/83	Amount of Cash Received This Period 1,000.00
B. Full Name, Mailing Address and ZIP Code Susan Perreira 3939 Lindenshire Dallas, TX 75230 Recruit For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Marlin Mortgage Co. Occupation Senior Vice President Appropriate Year-to-Date \$ 1,000.00	Date (month, day, year) 5/24/83	Amount of Cash Received This Period 1,000.00
C. Full Name, Mailing Address and ZIP Code Phillip Adams 4859 Forest Lane Dallas, TX 75234 Recruit For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Marlin Mortgage Co. Occupation Vice President Appropriate Year-to-Date \$ 600.00	Date (month, day, year) 5/24/83	Amount of Cash Received This Period 600.00
D. Full Name, Mailing Address and ZIP Code Larry Coffey 4723 Anchorage Arlington, TX 76016 Recruit For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Marlin Mortgage Co. Occupation Vice President Appropriate Year-to-Date \$ 350.00	Date (month, day, year) 5/25/83	Amount of Cash Received This Period 350.00
E. Full Name, Mailing Address and ZIP Code H. Rob Pressel 7010 Lake Louise Arlington, TX 76016 Recruit For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Marlin Savings Assn Marlin Mortgage Co. Occupation Senior Vice President Appropriate Year-to-Date \$ 350.00	Date (month, day, year) 6/1/83 8/24/83 10/17/83 12/19/83 12/20/83	Amount of Cash Received This Period 50.00 100.00 50.00 100.00 50.00
F. Full Name, Mailing Address and ZIP Code John Smith 108 Ricky Lane Burleson, TX 76028 Recruit For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Marlin Mortgage Co. Occupation Senior Vice President Appropriate Year-to-Date \$ 1,000.00	Date (month, day, year) 6/2/83	Amount of Cash Received This Period 1,000.00
G. Full Name, Mailing Address and ZIP Code William Eikenberry 2625 Cockrell Fort Worth, TX 76109 Recruit For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Marlin Mortgage Co. Occupation Vice President Appropriate Year-to-Date \$ 250.00	Date (month, day, year) 6/2/83 11/4/83	Amount of Cash Received This Period 150.00 100.00
SUBTOTAL of Receipts This Page (Include all)			
TOTAL This Period (Sum from this line number only)			

65113357

Any information reported here with respect to contributions may not be used for any purpose for the purpose of obtaining contributions or for payment of benefits, other than when the policy and terms of any contract entered into with contributions from such contributors.

Name of Contributor for Bond

A. Full Name, Mailing Address and ZIP Code Martin Morgan 8722 Overbrook Dr Dallas, TX 75230	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 6/8/83	Amount of Each Receipt This Period 700.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Nowlin Mortgage Co.	Aggregate Year-to-Date-\$ 700.00	
B. Full Name, Mailing Address and ZIP Code John E. McMillan, Jr. 4716 W. Sunset Rd Dallas, TX 75234	Name of Employer Nowlin Savings Assn. Nowlin Mortgage Co.	Date (month, day, year) 6/28/83	Amount of Each Receipt This Period 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President/Secretary	Aggregate Year-to-Date-\$ 250.00	
C. Full Name, Mailing Address and ZIP Code J. Ray Taylor 3695 Emerald Fort Worth, TX 76109	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 7/5/83	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director	Aggregate Year-to-Date-\$ 500.00	
D. Full Name, Mailing Address and ZIP Code Allen Jones P O Box 65001 Denver, CO 80206	Name of Employer Nowlin Savings Assn	Date (month, day, year) 7/26/83	Amount of Each Receipt This Period 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President	Aggregate Year-to-Date-\$ 250.00	
E. Full Name, Mailing Address and ZIP Code M. J. Maciejewski 8111 Schaffer Houston, TX 77070	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 8/1/83	Amount of Each Receipt This Period 300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President	Aggregate Year-to-Date-\$ 300.00	
F. Full Name, Mailing Address and ZIP Code Kenneth Garrett 4900 Westridge Ave Fort Worth, TX 76116	Name of Employer Nowlin Savings Assn.	Date (month, day, year) 9/6/83	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Director	Aggregate Year-to-Date-\$ 500.00	
G. Full Name, Mailing Address and ZIP Code Jim Witherow 1507 ElCamino Real Apt. 118B Dulles, TX 76039	Name of Employer Nowlin Mortgage Co.	Date (month, day, year) 6/28/83	Amount of Each Receipt This Period 300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Vice President	Aggregate Year-to-Date-\$ 300.00	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line necessary only)			14,350.00

A. Full Name, Mailing Address and ZIP Code Shade T. Nowlin 310 Rockwood Fort Worth, TX 76107		Name of Employer Nowlin Savings Assn. Nowlin Mortgage Co.	Date Month, day, year 1/26/84	Amount of Cash Received This Period 2,000.00
Reason For: ☒ Primary ☐ General ☐ Other (specify):		Occupation Chairman Aggregate Year-to-Date—\$ 2,000.00		
B. Full Name, Mailing Address and ZIP Code G. Jack Willey 765 Chaffin Ct. Arlington, TX 76011		Name of Employer Nowlin Mortgage Co.	Date Month, day, year 1/76 2/10	Amount of Cash Received This Period 500.00 500.00
Reason For: ☒ Primary ☐ General ☐ Other (specify):		Occupation Executive Vice President Aggregate Year-to-Date—\$ 51,000.00		
C. Full Name, Mailing Address and ZIP Code Richard Driscoll 12 Greenwood Lane Roanoke, TX 76262		Name of Employer Nowlin Savings Assn. Nowlin Mortgage Co.	Date Month, day, year 4/3/84	Amount of Cash Received This Period 300.00
Reason For: ☒ Primary ☐ General ☐ Other (specify):		Occupation VP & Controller Aggregate Year-to-Date—\$ 300.00		
D. Full Name, Mailing Address and ZIP Code Phillip Adams 6859 Forest Lane Dallas, TX 75234		Name of Employer Nowlin Mortgage Co.	Date Month, day, year 5/10/84	Amount of Cash Received This Period 500.00
Reason For: ☒ Primary ☐ General ☐ Other (specify):		Occupation Vice President Aggregate Year-to-Date—\$ 650.00		
E. Full Name, Mailing Address and ZIP Code James F. Beckman 1901 Indian Creek Dr. Fort Worth, TX 76107		Name of Employer Nowlin Savings Assn.	Date Month, day, year 5/10/84	Amount of Cash Received This Period 500.00
Reason For: ☒ Primary ☐ General ☐ Other (specify):		Occupation Director Aggregate Year-to-Date—\$ 500.00		
F. Full Name, Mailing Address and ZIP Code Loray Coffey 4723 Anchorage Arlington, TX 76016		Name of Employer Nowlin Mortgage Co.	Date Month, day, year 5/10/84	Amount of Cash Received This Period 375.00
Reason For: ☒ Primary ☐ General ☐ Other (specify):		Occupation Vice President Aggregate Year-to-Date—\$ 375.00		
G. Full Name, Mailing Address and ZIP Code Sam R. Day 2309 Medford Ct. Fort Worth, TX 76109		Name of Employer Nowlin Savings Assn.	Date Month, day, year 5/10/84	Amount of Cash Received This Period 500.00
Reason For: ☒ Primary ☐ General ☐ Other (specify):		Occupation Director Aggregate Year-to-Date—\$ 500.00		
SUBTOTAL of Receipts This Page (optional)				
TOTAL This Period (see page 10b line number 6a)				

SCHEDULE A

ITEMIZED RECEIPTS

LIN NUMBER

Attachment 10
(page 7 of 9)

Any information required from each Receipt for Schedule A may not be used by any person for the purpose of obtaining information or for any other purpose, other than the purpose for which the information was provided, and the information shall be kept confidential and not disclosed to any other person.

Name of Beneficiary Tax Payer

A. Full Name, Mailing Address and ZIP Code William Hildebrary 2625 Oakwell Fort Worth, TX 76109 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Vice President Aggregate Year-to-Date-\$ 300.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 300.00
B. Full Name, Mailing Address and ZIP Code Susan Ferreira 9990 Lindenshire Dallas, TX 75230 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Sr. VP Aggregate Year-to-Date-\$	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 1,500.00
C. Full Name, Mailing Address and ZIP Code H. Rob Fronscl 7010 Lant: Loulier Arlington, TX 76016 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Nowlin Savings Assn. Occupation Sr. VP Aggregate Year-to-Date-\$ 500.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
D. Full Name, Mailing Address and ZIP Code Kenneth Garrett 4900 Westridge Ave. Fort Worth, TX 76116 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Director Aggregate Year-to-Date-\$ 500.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 500.00
E. Full Name, Mailing Address and ZIP Code Georgia Hill 4216 Rickover Dr. Dallas, TX 75244 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Mortgage Co. Occupation Vice President Aggregate Year-to-Date-\$ 650.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 650.00
F. Full Name, Mailing Address and ZIP Code B. Larry Johnson 6909 Serrano Dr. Fort Worth, TX 76126 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Vice President Aggregate Year-to-Date-\$ 400.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 400.00
G. Full Name, Mailing Address and ZIP Code Allen Jones Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nowlin Savings Assn. Occupation Vice President Aggregate Year-to-Date-\$ 400.00	Date (month, day, year) 5/10/84	Amount of Each Receipt This Period 400.00
TOTAL of Receipts This Page (optional)			
TOTAL (For use of Tax Payer This Page Receipts only)			

8604051411390

TELECOM

ANALYST: Bryan

CONVERSATION WITH: B. Larry Johnson

COMMITTEE: NowPAC

DATE: 8/26/85

SUBJECT(S): Affiliation of Nowlin Savings Association and
Nowlin Mortgage Company

The RAD analyst called Mr. Johnson to request that he explain the relationship of Nowlin Savings Association (NSA) and Nowlin Mortgage Company (NMC). Mr. Johnson explained that the shareholders of NMC bought NSA and made NSA the parent and NMC the subsidiary. This would indicate that NSA is the connected organization.

Mr. Johnson also stated that he would provide written documentation detailing the affiliation.

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Attachment 12
(page 1 of 6)**NOWLIN SAVINGS**

August 26, 1985

Mr. J. Hunter Bryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K. Street, NW
Washington, DC 20463

Dear Mr. Bryan:

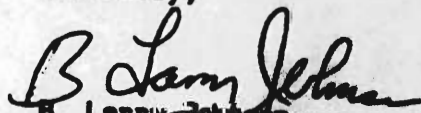
Per our conversation of today, you requested that I detail the affiliation of Nowlin Savings Association (NSA) and Nowlin Mortgage Company (NMC), and also to tie this into the merger of the PACs.

As indicated in Note 1 and 2 of Notes to Consolidated Financial Statements included in the 1982 Annual Report of Nowlin Savings Association (copy attached), effective April 1, 1982, the shareholders of NMC became the shareholders of NSA (formerly Cross Timbers Savings & Loan Association). Thereby, NMC was a subsidiary of NSA.

On April 4, 1983, NOWPAC and National NOWPAC were established. On June 20, 1984, it was decided (after consultation with your office - see letter dated June 4, 1985 and attachments) to consolidate the two PACs and file appropriate reports with both the Federal Elections Commission and the Secretary of the State of Texas. See letter dated July 22, 1985 and attachments.

I hope this details this matter completely. If you need more information, however, please call.

Sincerely,



B. Larry Johnson
Nowlin Mortgage/Nowlin Savings
Political Action Committee

dw
attachments

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NOWLIN SAVINGS

1982 Annual Report

NOWLIN MORTGAGE

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(Note: Only the relevant portions have been provided.)



Nowlin Savings Association provides depository services for residents in Tarrant, Hood and Erath Counties. Its affiliate, Nowlin Mortgage Company, originates and services residential and commercial loans for approximately 200 investors throughout the United States through three branch offices in the Fort Worth area, four branch offices in the Dallas area, and two branch offices in Houston.

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PROGRESS REPORT

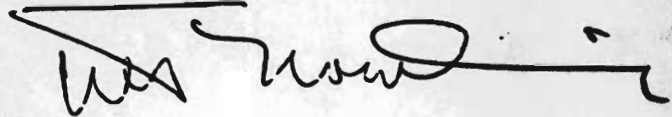
This report is for an abbreviated period of only six months (ending December 31, 1982) due to our plan to make future financial reports on a calendar year basis. Consequently, our next statement will be submitted to you for the full year ending December 31, 1983.

We are hopeful that the long awaited revival of the housing industry has begun. The half year period we have just closed has resulted in record production, both residential and commercial, excellent profits, and substantial growth in the size of our servicing portfolio. We have also made significant additions to our staff.

Our new parent, Nowlin Savings, continues to present opportunities for expanded services and profit. As we further develop these synergistic capabilities, new horizons make possible greater services to our borrowers and investors.

For the full year 1983, we are optimistic that the economy will permit a healthy period for Nowlin Savings/Nowlin Mortgage.

Yours very truly,


Wade T. Nowlin
Chairman of the Board


H. Campbell Wood
President

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NOWLIN SAVINGS ASSOCIATION NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

NOTE 1 — Summary of Significant Accounting Policies

Principles of Consolidation

During 1982, a business combination between Nowlin Mortgage Company and Cross Timbers Savings and Loan Association was consummated (see Note 2). Subsequent to this acquisition the name of Cross Timbers Savings and Loan Association was changed to Nowlin Savings Association. For the year ended June 30, 1982, these financial statements include the operations of Nowlin Mortgage Company and its wholly-owned subsidiary, Metroplex Mortgage Company for the twelve-month period, and the operations of Nowlin Savings Association for the three-month period then ended. For the six months ended December 31, 1982, the financial statements include the accounts of Nowlin Savings Association and its wholly-owned subsidiary, Nowlin Mortgage Company. Inter-company balances, transactions, and ownership have been eliminated in consolidation.

Loans Held for Sale

Mortgage loans are recorded in inventory when funds are disbursed to acquire the loan. The inventory of mortgage loans held for sale in the normal course of business is stated at the lower of cost or market. In determining market value, consideration is given to commitments on hand from investors and prevailing market prices. As appropriate, the association hedges mortgage loans held for sale by taking positions in the futures market opposite to its positions in the cash market, in order to shift the risk of significant market fluctuations to speculators. Transactions involving futures market contracts are used in computations of lower cost or market for mortgage loans held for sale. Provision for potential future losses due to decline in market value is calculated on the aggregate inventory basis and is charged to income.

Premises and Equipment

All premises and equipment are recorded at cost and depreciated on a straight-line basis over the expected useful lives of the assets. Expenditures for normal maintenance and repairs are charged to income, and significant improvements are capitalized. Cost of assets sold or abandoned and the related accumulated depreciation are eliminated from the accounts and the net amount, less proceeds from disposal, is charged or credited to income.

Amortization of Cost of Acquired Servicing

Certain costs have been deferred by Nowlin Mortgage Company associated with bulk purchases of mortgages. The purchase and resale of mortgages is a transaction similar to the purchase of mortgage servicing contracts and, accordingly, costs have been deferred which are not in excess of amounts recoverable from future servicing revenue. In addition, certain costs have been deferred by the company which represent the purchase price of portfolios acquired from others allocated to future income to be derived from servicing such portfolios. These costs are being amortized over periods not exceeding ten years.

Other Income Recognition Policies

Residential loan origination fees are recorded as income upon collection at loan settlement. Placement fees are recognized as earned at the time loan commitments have been obtained and accepted.

Fees paid to investors for residential loan commitments are expensed as the commitment is filled or upon expiration of the commitment.

Intangible Assets Arising From Acquisitions (See Note 2)

The excess of the purchase price paid over the net assets acquired is being amortized over periods of 12 and 40 years. Amortization is by both the straight-line and interest method and is based upon the association's productive assets acquired (see Note 6).

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NOWLIN SAVINGS ASSOCIATION NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Federal Income Taxes

The association is allowed a bad debt deduction subject to certain limitations based upon aggregate loans and savings account balances at the end of the year. If the amounts that qualify as deductions for federal income tax purposes are later used for purposes other than bad debt losses, they will be subject to federal income tax at the then current corporate rate. Because the association does not intend to use the reserve for purposes other than to absorb losses, no deferred income taxes have been provided and, thus, the income tax provision is substantially less than the amount computed by applying statutory income tax rates. Deferred federal income taxes result principally from timing differences between financial and tax reporting purposes for:

- Adjustments to the cash basis for tax purposes
- Net gains or losses on sale of loan participations recognized differently for financial and tax reporting purposes

The association uses the flow-through method to account for the investment tax credit.

Earnings Per Share

Earnings per share are based on the average number of common shares outstanding.

NOTE 2 — Acquisition

Effective April 1, 1982, a business combination was consummated whereby the shareholders of Nowlin Mortgage Company became the shareholders of Cross Timbers Savings and Loan Association and the savings and loan association became the parent of Nowlin Mortgage Company. For financial statement purposes, the acquisition has been accounted for under the purchase method.

The net purchase price of \$800,000 has been allocated to the fair value of net assets acquired and the excess of the purchase price over the fair value of the net assets acquired is being amortized based on the method described in Note 1.

Pro forma financial information has been

prepared in accordance with Accounting Principle Board Opinion No. 16 and is based on the assumption that Nowlin Savings Association was acquired as of July 1, 1981, at the same purchase price.

Thousands of Dollars,
Except Per Share Data

Year Ended
June 30, 1982

Total revenues	\$11,900
Net income	\$ 1,780
Net income per share	\$ 30.21

NOTE 3 — Other Loans

Other loans at December 31, 1982 are summarized as follows:

First mortgage loans	\$80,447,943
Construction loans	1,179,180
Notes receivable	886,883
Consumer loans	371,747
Loans secured by savings deposits	412,084
	<u>\$83,306,837</u>
Less:	
Participations sold	45,391,857
Unearned discounts	149,374
Loans in process	139,149
	<u>\$ 7,806,657</u>

NOTE 4 — Federal Home Loan Bank and Federal National Mortgage Association Stock

The association is required to own stock in the Federal Home Loan Bank (FHLB) and the Federal National Mortgage Association (FNMA). At December 31, 1982, the association owned 1,900 shares of FHLB and 27,010 shares of FNMA stock. These shares of stock had market values of \$190,000 and \$681,745, respectively.

NOTE 5 — Premises and Equipment

At December 31, 1982, premises and equipment consisted of the following:

Land	\$ 175,718
Building and building improvements	803,559
Furniture, fixtures and equipment	1,007,499
	<u>1,986,776</u>
Accumulated depreciation	510,522
	<u>\$1,476,254</u>



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF FOUR # 2158

Date Filmed 10/2/76 Camera No. ---- 2

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