



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

23.5.87

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2224 .

87047646031

cc: Dr. Carl F. Raba, Jr.
P. O. Box 690287
San Antonio, Texas 78269-0287

MEMORANDUM

QCC# 2721

TO: Debra A. ^{Trimiew}~~Reed~~

TO: *Cecilia Lieber*
~~Judy Smith~~

FROM: *Cecilia Lieber*
~~Judy Smith~~

FROM: Debra A. ^{Trimiew}~~Reed~~

87 FEB 18 AIB: BJB

RECEIVED
GENERAL
OFFICE

CHECK NO. 06747 (a copy of which is attached) RELATING
TO MUR 2224(Snyder) AND NAME Carl F. Raba, Jr.
WAS RECEIVED ON 2/18/87. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT (#95F3875.16)
/ ☒ CIVIL PENALTIES ACCOUNT (#95-1099.160)
/ / OTHER _____

SIGNATURE *Debra A. Trimiew* DATE 2/18/87

0 8 0 7 5 0 6 0 2 8

Foster, Lewis, Langley, Gardner & Banack

INCORPORATED
Attorneys at Law
Sixteenth Floor Frost Bank Tower
(512) 226-3116

SAN ANTONIO, TEXAS February 10, 19 87

No. 06747

$\frac{30.9}{1140}$

PAY TO THE ORDER OF FEDERAL ELECTION COMMISSION

\$1,000.00

-----One thousand and no/100----- DOLLARS

FOSTER, LEWIS, LANGLEY, GARDNER & BANACK

INCORPORATED

FROST NATIONAL BANK

SAN ANTONIO, TEXAS

BY

⑈006747⑈ ⑆114000093⑆ 0 147 389⑈

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

FOSTER, LEWIS, LANGLEY, GARDNER & BANACK

INCORPORATED
SAN ANTONIO, TEXAS

DATE	DESCRIPTION	AMOUNT	DEDUCTIONS	NET
2/10/87	Carl F. Raba, Jr. MUR 2224	\$1,000.00		\$1,000.00

JWR #6747

1 2 1 1 4 1 3 .

Federal Election Commission
990 "E" Street Northwest
Washington, D.C. 20463

7/19/77 09:03



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2224

DATE FILMED 4/2/87 CAMERA NO. 4

CAMERAMAN GPC

87040646921

FEDERAL ELECTION COMMISSION

Consultation materials, 12 day report,
comment sheets, routing slips,
NAB referral standards

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

Charles White

date

3-25-87

FEC 9-21-77

37040646922



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 5, 1987

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth Committee
7224 Blanco Road
San Antonio, TX 78216

RE: MUR 2224
Friends of Jeff Wentworth
Committee and James E.
McCann, Jr., as treasurer

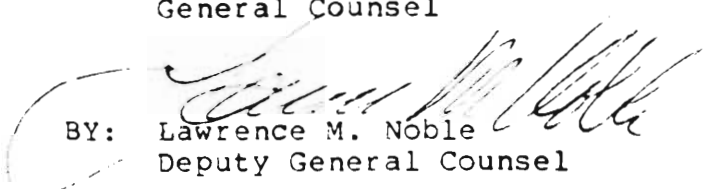
Dear Mr. McCann:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY:  Lawrence M. Noble
Deputy General Counsel

37040546923



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth Committee
7224 Blanco Road
San Antonio, TX 78216

RE: MUR 2224
Friends of Jeff Wentworth
Committee and James E.
McCann, Jr., as treasurer

Dear Mr. McCann:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

870404



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 5, 1987

Jospeh W. Russell, Esquire
Foster, Lewis, Langley,
Gardner & Banack
Frost Bank Tower
Sixteenth Floor
San Antonio, TX 78205

RE: MUR 2224
Carl F. Raba, Jr.

Dear Mr. Russell:

On February 3, 1987, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. (Please make your civil penalty check payable to the Federal Election Commission). However, 2 U.S.C. § 437q(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*
Deputy General Counsel

Enclosure
Conciliation Agreement



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Jospeh W. Russell, Esquire
Foster, Lewis, Langley,
Gardner & Banack
Frost Bank Tower
Sixteenth Floor
San Antonio, TX 78205

RE: MUR 2224
Carl F. Raba, Jr.

Dear Mr. Russell:

On , 1987, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. (Please make your civil penalty check payable to the Federal Election Commission). 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
Deputy General Counsel

Enclosure
Conciliation Agreement

37040643925

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Carl F. Raba, Jr.) MUR 2224
)

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. Reason to believe has been found that Carl F. Raba, Jr. ("Respondent") violated 2 U.S.C. § 441a(a)(1), by making an excessive contribution of \$8,000.

NOW, THEREFORE, the Commission and Respondent, 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 Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. Respondent, an individual, made loans of \$8,000 to the Friends of Jeff Wentworth Committee, the authorized political committee of a candidate for the U.S. House of Representatives.

2. Respondent had previously contributed \$1,000 to the Friends of Jeff Wentworth Committee.

3. A loan is a campaign contribution under 2 U.S.C. § 431(8)(A)(i). No individual may make a contribution to an authorized political committee of a candidate for Federal office in excess of \$1,000, under 2 U.S.C. § 441a(a)(1).

4. Respondent contends that he was not aware, at the time the loans were made, that such loans constituted an excessive contribution; and that the loans were repaid in full prior to the Commission's initiating any inquiry or enforcement action concerning this matter.

V. Respondent's excessive contribution of \$8,000 to an authorized political committee was in violation of 2 U.S.C. § 441a(a)(1).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand dollars (\$1,000), 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.

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.

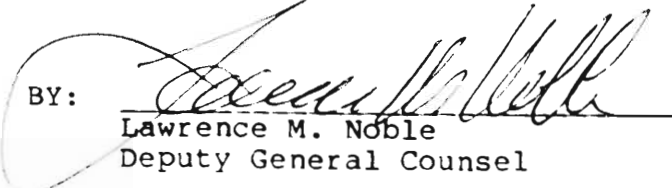
IX. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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:

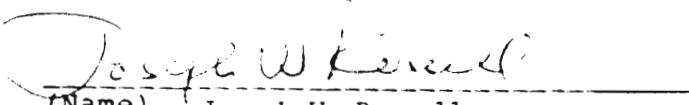
Charles N. Steele
General Counsel

BY:


Lawrence M. Noble
Deputy General Counsel

2/5/87
Date

FOR THE RESPONDENT:


(Name) Joseph W. Russell
(Position) Counsel

December 22, 1986
Date

370406459929

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Carl F. Raba, Jr.) MUR 2224

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of February 3,
1987, do hereby certify that the Commission decided by a
vote of 6-0 to take the following actions in MUR 2224:

1. Accept the agreement with Carl F. Raba,
 Jr., as recommended in the General
 Counsel's report dated January 21, 1987.
2. Approve and send the letters attached
 to the General Counsel's report dated
 January 21, 1987.
3. Close the file.

Commissioners Aikens, Elliott, Josefiak, McDonald,
McGarry, and Thomas voted affirmatively for the decision.

Attest:

2/4/87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: *MCE* MARJORIE W. EMMONS / JOSHUA MCFADDEN *GM*

DATE: JANUARY 27, 1987

SUBJECT: OBJECTION TO MUR 2224 - GENERAL COUNSEL'S REPORT
SIGNED JANUARY 21, 1987

The above-captioned document was circulated to the
Commission on Friday, January 23, 1987 at 2:00 P.M.

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

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____ X _____

This matter will be placed on the Executive Session
agenda for Tuesday, February 3, 1987.

87040546931

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Carl F. Raba, Jr.

)
)
)

MUR 2224

67 JAN 22
A 3:41

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Joseph W. Russell, counsel to respondent in the above referenced matter.

II. RECOMMENDATIONS

1. Accept the attached agreement with Carl F. Raba, Jr.
2. Approve and send the attached letters.

8704064332

3. Close the file.

Charles N. Steele
General Counsel

Date

12/21/87

BY:

Lawrence M. Noble
Deputy General Counsel

Attachments

1. Conciliation agreement
2. Letter to Joseph W. Russell
3. Letter to James E. McCann, Jr.

37040543933

Attachment 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Carl F. Raba, Jr.) MUR 2224
)

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. Reason to believe has been found that Carl F. Raba, Jr. ("Respondent") violated 2 U.S.C. § 441a(a)(1), by making an excessive contribution of \$8,000.

NOW, THEREFORE, the Commission and Respondent, 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 Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. Respondent, an individual, made loans of \$8,000 to the Friends of Jeff Wentworth Committee, the authorized political committee of a candidate for the U.S. House of Representatives.

2. Respondent had previously contributed \$1,000 to the Friends of Jeff Wentworth Committee.

3. A loan is a campaign contribution under 2 U.S.C. § 431(8)(A)(i). No individual may make a contribution to an authorized political committee of a candidate for Federal office in excess of \$1,000, under 2 U.S.C. § 441a(a)(1).

4. Respondent contends that he was not aware, at the time the loans were made, that such loans constituted an excessive contribution; and that the loans were repaid in full prior to the Commission's initiating any inquiry or enforcement action concerning this matter.

V. Respondent's excessive contribution of \$8,000 to an authorized political committee was in violation of 2 U.S.C. § 441a(a)(1).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand dollars (\$1,000), 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.

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

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 N. Steele
General Counsel

BY:

Lawrence M. Noble
Deputy General Counsel

Date

FOR THE RESPONDENT:

Joseph W. Russell
(Name) Joseph W. Russell
(Position) Counsel

December 20, 1956
Date

87040545930

attachment 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jospeh W. Russell, Esquire
Foster, Lewis, Langley,
Gardner & Banack
Frost Bank Tower
Sixteenth Floor
San Antonio, TX 78205

RE: MUR 2224
Carl F. Raba, Jr.

Dear Mr. Russell:

On , 1987, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. (Please make your civil penalty check payable to the Federal Election Commission). 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
Deputy General Counsel

Enclosure
Conciliation Agreement

3704064377



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth Committee
7224 Blanco Road
San Antonio, TX 78216

RE: MUR 2224
Friends of Jeff Wentworth
Committee and James E.
McCann, Jr., as treasurer

Dear Mr. McCann:

9 7 0 4 0 4 . 0 3
This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel ^{CM}
DATE: January 21, 1987
SUBJECT: MUR 2224 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[X]	Compliance	[X]
Sensitive	[X]	Audit Matters	[]
Non-Sensitive	[]	Litigation	[]
24 Hour No Objection	[]	Closed MUR Letters	[]
Sensitive	[]	Status Sheets	[]
Non-Sensitive	[]	Advisory Opinions	[]
Information	[]	Other (see distribution below)	[]
Sensitive	[]		
Non-Sensitive	[]		
Other	[]		



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 7, 1987

James E. McCann, Jr.
Treasurer
Friends of Jeff Wentworth
7224 Blanco Road
San Antonio, Texas 78216

RE: MUR 2224

Dear Mr. McCann:

On January 5, 1987, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the Friends of Jeff Wentworth and you as treasurer, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. 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 within 10 days.

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

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

Sincerely,

Charles N. Steele
General Counsel

By: *Lawrence M. Noble*
Deputy General Counsel

Enclosure
Conciliation Agreement

37040043940

RECEIVED AT THE FEC
HAND DELIVERED
86 NOV 13 ALL: 35

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of Jeff Wentworth Committee) MUR 2224
and James E. McCann, Jr., as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the Friends of Jeff Wentworth Committee and James E. McCann, Jr., as treasurer ("Respondents") violated 2 U.S.C. § 441a(f), by accepting an excessive contribution of \$8,000.

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.

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

1. Respondent the Friends of Jeff Wentworth Committee was the authorized political committee of Jeff Wentworth, then a

97040343941

candidate for the U.S. House of Representatives. Respondent James E. McCann, Jr., was the treasurer of that committee.

2. Respondents accepted \$8,000 in loans from Carl F. Raba Jr. Respondents had previously accepted a \$1,000 contribution from Mr. Raba.

3. A loan is a campaign contribution under 2 U.S.C. § 431(8)(A)(i). The authorized political committee of a candidate may not accept an individual contribution in excess of \$1,000 under 2 U.S.C. § 441a(f).

V. Respondents' acceptance of an \$8,000 excessive contribution was in violation of 2 U.S.C. § 441a(f).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand dollars (\$1,000), 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.

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.

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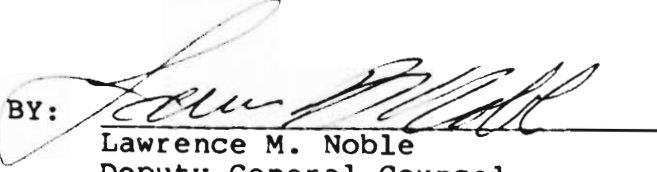
IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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 N. Steele
General Counsel

BY:


Lawrence M. Noble
Deputy General Counsel

1/8/87
Date

FOR THE RESPONDENTS:


(Name)
(Position) *Treasurer*

November 12, 1986
Date

*Friends of Jeff Wentworth
Committee*

37017343043



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

James E. McCann, Jr.
Treasurer
Friends of Jeff Wentworth
7224 Blanco Road
San Antonio, Texas 78216

RE: MUR 2224

Dear Mr. McCann:

On January 5, 1987, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the Friends of Jeff Wentworth and you as treasurer, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. 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 within 10 days.

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

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

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

encl 1/7/87

*1000
1/7/87*

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Friends of Jeff Wentworth) MUR 2224
Committee and James E.)
McCann, Jr., as treasurer;)
Carl F. Raba, Jr.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 5, 1987 the Commission decided by a vote of 6-0 to take the following actions in MUR 2224:

1. Accept the Conciliation agreement with the Friends of Jeff Wentworth Committee and James E. McCann, as treasurer, and close the file as to these respondents, as recommended in the General Counsel's Report signed December 29, 1986.
2. Approve and send the letter, as recommended in the General Counsel's Report signed December 19, 1986.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

1-6-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Tues.,	12-30-86	12:43
Circulated on 48 hour tally basis:	Tues.,	12-30-86	4:00
Deadline for vote:	Mon.,	01-05-87	4:00

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
Friends of Jeff Wentworth) MUR 2224
Committee and James E.)
McCann, Jr., as treasurer;)
Carl F. Raba, Jr.)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by James E. McCann, treasurer of the Friends of Jeff Wentworth Committee. A check for the civil penalty has been received. The

II. RECOMMENDATIONS

1. Accept the attached agreement with the Friends of Jeff Wentworth Committee and James E. McCann, as treasurer, and close the file as to these respondents.
2. Approve and send the attached letter.

Charles N. Steele
General Counsel

Date

12/29/86

BY:

Lawrence M. Noble
Deputy General Counsel

Attachments

1. Conciliation agreement
2. Civil Penalty check
3. Letter to James E. McCann, Jr.

370404045

attachment 1

RECEIVED AT THE FEC
HAND DELIVERED
86 NOV 13 ALL: 35

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Friends of Jeff Wentworth Committee) MUR 2224
and James E. McCann, Jr., as treasurer)
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the Friends of Jeff Wentworth Committee and James E. McCann, Jr., as treasurer ("Respondents") violated 2 U.S.C. § 441a(f), by accepting an excessive contribution of \$8,000.

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.

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

1. Respondent the Friends of Jeff Wentworth Committee was the authorized political committee of Jeff Wentworth, then a

candidate for the U.S. House of Representatives. Respondent James E. McCann, Jr., was the treasurer of that committee.

2. Respondents accepted \$8,000 in loans from Carl F. Raba Jr. Respondents had previously accepted a \$1,000 contribution from Mr. Raba.

3. A loan is a campaign contribution under 2 U.S.C. § 431(8)(A)(i). The authorized political committee of a candidate may not accept an individual contribution in excess of \$1,000 under 2 U.S.C. § 441a(f).

V. Respondents' acceptance of an \$8,000 excessive contribution was in violation of 2 U.S.C. § 441a(f).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand dollars (\$1,000), 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.

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 N. Steele
General Counsel

BY:

Lawrence M. Noble
Deputy General Counsel

Date

FOR THE RESPONDENTS:

James E. McCann, Jr.
(Name)
(Position) *Treasurer*
Friends of Jeff Wentworth
Committee

November 12, 1986
Date

270010040100

Snyder

attaches 72

COMMERCIAL NATIONAL BANK
P.O. BOX 16016
SAN ANTONIO, TX 78216

FRIENDS OF JEFF WENTWORTH
P. O. BOX 32948 512-340-1986
SAN ANTONIO, TEXAS 78216

0786

11-12 1986

PAY TO THE ORDER OF Treasurer of the United States \$ 1,000.00
One thousand and 00/100 DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS

James E. McCann, Jr.

⑈000786⑈ ⑆114014445⑆ ⑈100 349 5⑈

GCC 2005

MEMORANDUM

TO: Debra A. Reed TO: Judy Smith

FROM: Judy Smith FROM: Debra A. Reed ^{Trimier}

CHECK NO. 0786 (a copy of which is attached) RELATING
TO MUR 2224 AND NAME Friends of Jeff Wentworth Committee
and James E. McCann, Jr. as treas.
WAS RECEIVED ON 11/14/86. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

/ ☒ BUDGET CLEARING ACCOUNT (#95F3875.16)
/ / CIVIL PENALTIES ACCOUNT (#95-1099.160)
/ / OTHER _____

SIGNATURE

Debra A. Trimier

DATE

11/17/86

attachment 3



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

James E. McCann, Jr.
Treasurer
Friends of Jeff Wentworth
7224 Blanco Road
San Antonio, Texas 78216

RE: MUR 2224

Dear Mr. McCann:

On , 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the Friends of Jeff Wentworth and you as treasurer, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. 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 within 10 days.

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

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

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

970404351



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Red*
DATE: December 30, 1986
SUBJECT: MUR 2224 - General Counsel's Rpt.

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒ [x]
Sensitive ☒ [x]
Non-Sensitive ☐ []

24 Hour No Objection ☐ []
Sensitive ☐ []
Non-Sensitive ☐ []

Information ☐ []
Sensitive ☐ []
Non-Sensitive ☐ []

Other ☐ []

DISTRIBUTION

Compliance ☒ [x]
Audit Matters ☐ []

Litigation ☐ []
Closed MUR Letters ☐ []

Status Sheets ☐ []
Advisory Opinions ☐ []

Other (see distribution below) ☐ []

37040543952

2. Respondent had previously contributed \$1,000 to the Friends of Jeff Wentworth Committee.

3. A loan is a campaign contribution under 2 U.S.C. § 431(8)(A)(i). No individual may make a contribution to an authorized political committee of a candidate for Federal office in excess of \$1,000, under 2 U.S.C. § 441a(a)(1).

4. Respondent contends that he was not aware, at the time the loans were made, that such loans constituted an excessive contribution; and that the loans were repaid in full prior to the Commission's initiating any inquiry or enforcement action concerning this matter.

V. Respondent's excessive contribution of \$8,000 to an authorized political committee was in violation of 2 U.S.C. § 441a(a)(1).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand dollars (\$1,000), 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.

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

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 N. Steele
General Counsel

BY:

Lawrence M. Noble
Deputy General Counsel

Date

FOR THE RESPONDENT:

(Name)
(Position)

Date

37040541955



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Red*
DATE: December 4, 1986
SUBJECT: MUR 2224 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information [X]
Sensitive [X]
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Carl F. Raba, Jr.) MUR 2224
)

GENERAL COUNSEL'S REPORT

On October 7, 1986, the Commission authorized the commencement of conciliation with the Respondents in the above-captioned Matter prior to a finding of probable cause to believe. The Office of General Counsel has concluded that an extension of the conciliation period by an additional thirty days would facilitate the conclusion of a satisfactory settlement with the Respondents.

Charles N. Steele
General Counsel

Date

12/3/86

BY:

Lawrence M. Noble (L/M)
Lawrence M. Noble
Deputy General Counsel

SENSITIVE

06 DEC 11

P4:25

37040445037

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Carl F. Raba, Jr.) MUR 2224
)

GENERAL COUNSEL'S REPORT

On October 7, 1986, the Commission authorized the commencement of conciliation with the Respondents in the above-captioned Matter prior to a finding of probable cause to believe. The Office of General Counsel has concluded that an extension of the conciliation period by an additional thirty days would facilitate the conclusion of a satisfactory settlement with the Respondents.

Charles N. Steele
General Counsel

12/3/86
Date

BY: Lawrence M. Noble (L/N)
Lawrence M. Noble
Deputy General Counsel

06C
SENSITIVE

03 DEC 1

FD-25

370404033

COMMERCIAL NATIONAL BANK
P.O. BOX 14016
SAN ANTONIO, TX 78216

FRIENDS OF JEFF WENTWORTH
P. O. BOX 32948 512-340-1988
SAN ANTONIO, TEXAS 78218

0786

11-12 1986

PAY TO THE ORDER OF Treasurer of the United States \$ 1,000.00
One thousand and 00/100 DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS

James E. McCann, Jr.

⑈000786⑈ ⑆114014445⑆ ⑈100 349 5⑈

MEMORANDUM

TO: Debra A. Reed TO: Judy Smith

FROM: Judy Smith FROM: Debra A. Reed

CHECK NO. 0786 (a copy of which is attached) RELATING
TO MUR 2224 (Snyder) AND NAME Friends of Jeff Wentworth Committee
and James E. McCann, Jr. as treas
WAS RECEIVED ON 11/14/86. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

/ ☒ BUDGET CLEARING ACCOUNT (#95F3875.16)
/ / CIVIL PENALTIES ACCOUNT (#95-1099.160)
/ / OTHER _____

SIGNATURE Debra A. Trimier DATE 11/17/86



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

October 9, 1986

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth Committee
7224 Blanco Road
San Antonio, Texas 78216

RE: MUR 2224
Friends of Jeff Wentworth
Committee and James E.
McCann, Jr., as treasurer

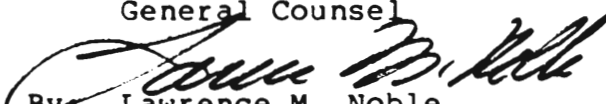
Dear Mr. McCann:

On August 19, 1986, the Commission found reason to believe that the Friends of Jeff Wentworth Committee and you, as treasurer, violated 2 U.S.C. § 441a(f). At your request, the Commission determined on October 7, 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 you 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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: 
Lawrence M. Noble
Deputy General Counsel

Enclosures

9704064330



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 9, 1986

Joseph W. Russell, Esquire
Foster, Lewis, Langley, Gardner & Banack
16th Floor
Frost Bank Tower
San Antonio, Texas 78205

RE: MUR 2224
Carl Raba, Jr.

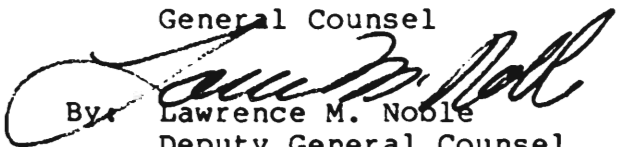
Dear Mr. Russell:

On August 19, 1986, the Commission found reason to believe that Carl F. Raba, Jr. violated 2 U.S.C. § 441a(a)(1). At your request, the Commission determined on October 7, 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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: 
Lawrence M. Noble
Deputy General Counsel

Enclosures

97710643951



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth Committee
7224 Blanco Road
San Antonio, Texas 78216

RE: MUR 2224
Friends of Jeff Wentworth
Committee and James E.
McCann, Jr., as treasurer

Dear Mr. McCann:

On August 19, 1986, the Commission found reason to believe that the Friends of Jeff Wentworth Committee and you, as treasurer, violated 2 U.S.C. § 441a(f). At your request, the Commission determined on , 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 you 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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosures

copy
10/9



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Joseph W. Russell, Esquire
Foster, Lewis, Langley, Gardner & Banack
16th Floor
Frost Bank Tower
San Antonio, Texas 78205

RE: MUR 2224
Carl Raba, Jr.

Dear Mr. Russell:

On August 19, 1986, the Commission found reason to believe that Carl F. Raba, Jr. violated 2 U.S.C. § 441a(a)(1). At your request, the Commission determined on , 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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosures

C.24 10/9

TGW 10/9/86

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of Jeff Wentworth) MUR 2224
Committee and James E.)
McCann, Jr., as treasurer;)
Carl F. Raba, Jr.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 7, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 2224:

1. Enter into conciliation with the Friends of Jeff Wentworth Committee and James E. McCann, Jr., as treasurer, and Carl F. Raba, Jr., prior to finding of probable cause to believe.
2. Approve and send the proposed conciliation agreements, as recommended in the General Counsel's Report signed October 2, 1986.
3. Approve and send the letter, as recommended in the General Counsel's Report signed October 2, 1986.

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

Attest:

10-8-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Fri., 10-3-86, 9:38
Circulated on 48 hour tally basis: Fri., 10-3-86, 2:00
Deadline for vote: Tues., 10-7-86, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Red*
DATE: October 3, 1986
SUBJECT: MUR 2224 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒

Audit Matters ☐

Litigation ☐

Closed MUR Letters ☐

Status Sheets ☐

Advisory Opinions ☐

Other (see distribution below) ☐

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
 Friends of Jeff Wentworth)
 Committee and James E.)
 McCann, Jr., as treasurer;)
 Carl F. Raba, Jr.)

MUR 2224

80:20

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On August 19, 1986, the Federal Election Commission found reason to believe that the Friends of Jeff Wentworth Committee ("FJW") and James E. McCann, Jr., as treasurer, violated 2 U.S.C. § 441a(f), and that Carl F. Raba, Jr., violated 2 U.S.C. § 441a(a)(1). Respondents have now requested pre-probable cause conciliation. (Attachments 1 and 2).

II. LEGAL ANALYSIS

(See First General Counsel's Report, signed August 6, 1986).

It is undisputed that Mr. Raba lent a total of \$8,000 to FJW in addition to a previous \$1,000 contribution to that committee. Thus the loans in question represented an \$8,000 excessive contribution from Mr. Raba to FJW. This Office therefore recommends proceeding to pre-probable cause conciliation.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

0 2 1 1 0 4 3 3 5 5

IV. RECOMMENDATIONS

1. Enter into conciliation with the Friends of Jeff Wentworth Committee and James E. McCann, Jr., as treasurer, and Carl F. Raba, Jr., prior to a finding of probable cause to believe.
2. Approve and send the attached proposed conciliation agreements.
3. Approve and send the attached letters.

Charles N. Steele
General Counsel

10/8/86

Date

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

Attachments

1. Letter from Joseph W. Russell
2. Letter from James E. McCann, Jr.
3. Response of the Jeff Wentworth for Congress Committee
4. Proposed conciliation agreements (2)
5. Proposed letters to respondents

37140546957

attachment 1

CCC#

WAKO 11/11/86

FOSTER, LEWIS, LANGLEY, GARDNER & BANACK

SEP 17 11:21

INCORPORATED
ATTORNEYS AT LAW

SIXTEENTH FLOOR
FROST BANK TOWER

SAN ANTONIO, TEXAS 78205

(512) 226-3116

GEORGE A. OLSON, P.C.

September 16, 1986

BEN F. FOSTER, JR., P.C.
A. J. LEWIS, P.C.

TELECOPIER
(512) 226-1065

SEP 17 11:03

RALPH LANGLEY
PAT H. GARDNER
A. J. LEWIS, JR.
EMERSON BANACK, JR.
CHARLES R. ROBERTS
EDWARD KIEWER III
RICHARD L. KERR
WILLIAM T. ARMSTRONG III
JOSEPH W. RUSSELL
JAMES E. WILLINGHAM, JR.
KENNETH L. MALONE
RONALD B. KING
ROBERT RUSSO
A. J. LEWIS III
SCOTT E. BREEN
KAREN M. VAUGHAN

JOHN B. STEWART
HARRY W. WOLFF, JR.
RICHARD D. BLAU
RANDALL H. ERBEN
MICHAEL R. GARATONI
WILLIAM G. SHOWN
ROSEMARY L. HOLLAN
JAMES K. LOWRY, JR.
DALE WILSON
SUSAN L. GELLIS
WILL C. JONES III
NAN R. SEIDENFELD
PETER L. KILPATRICK
R. FLINT BOURGEOIS
THOMAS M. PICKFORD, JR.

AIRBORNE FREIGHT

Office of General Counsel
Federal Election Commission
Attention: Mr. Charles Snyder
999 "E" Street, N.W.
Washington, D.C. 20463

Re: MUR 2224, Carl F. Raba, Jr.

Dear Mr. Snyder:

Pursuant to our telephone conference of September 12, 1986, I am sending this letter to request "pre probable cause conciliation" with respect to this matter.

My client, Carl F. Raba, Jr., made the two loans in question in complete innocence and good faith. It was at all times fully intended by Carl F. Raba, Jr., that both the loans would be fully repaid.

In fact, the loans were repaid with interest, and no benefit of any amount was conferred on the Jeff Wentworth Political Committee.

Accordingly, in our view this presents a clear case of unintentional error committed through ignorance of a technical provision of the law, and though there may be a technical violation, there should be no sanctions imposed in view of the fact that no tangible dollar amount of benefit was conferred on the Political Committee.

We will be happy to furnish further information and to consult with you further regarding any aspect of this matter.

Thank you very much for your attention to this matter.

Yours truly,

Joseph W. Russell

JWR/smk

cc: Carl F. Raba, Jr.

attachment 2

RECEIVED BY THE FEC
GCC 1578
86 SEP 22 P 2: 10
Singer

★★JEFF★★
WENTWORTH
CONGRESS

September 15, 1986

Mr. Charles Steele
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

★Dear Mr. Steele:

In connection with MUR 2224, Friends of Jeff Wentworth and James E. McCann, Jr., as treasurer, I hereby respectfully request pre-probable cause conciliation of this matter.

Sincerely,

James E. McCann, Jr.
James E. McCann, Jr., C.P.A.
Treasurer

Certified Mail No. P 594 282 022
Return Receipt Requested

86 SEP 22 P 3: 41
CHIEF OF BUREAU
FEDERAL ELECTION COMMISSION

7224 Blanco Road, San Antonio, Texas 78216 ★ (512) 340-1986

Paid for by Friends of Jeff Wentworth

9 7 0 4 0 6 4 3 9 6 9

Attachment 3

WCC# 1593
Snyder

To Oge
9-22-86

★★JEFF★★
WENTWORTH
CONGRESS

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

SEP 22 P 4: 27

September 15, 1986

Rec. 9-22
Certified Mail
Aikens

ens
mission
st
463

Re: MUR 2224

Friends of Jeff Wentworth and
James E. McCann, Jr., as treasurer

★

Dear Ms. Aikens:

Thank you for your recent letter which I received on
September 2 after returning from a Labor Day holiday weekend.

I have today requested pre-probable cause conciliation
of this matter, which request was made to Mr. Charles Steele,
General Counsel of the Federal Election Commission.

The two loans totalling \$8,000 from Dr. Carl F. Raba, Jr.
were accepted by the Friends of Jeff Wentworth Committee in
the mistaken belief that loans could be legally taken from
any source so long as they were actually repaid and that the
loans were made at the prevailing commercial interest rate
at the time they were made.

Subsequent to our accepting these two loans and prior to
any communication whatever, oral or written, with the Federal
Election Commission, we discovered while reviewing provisions
of the Federal Election Campaign Act that what we had done was
not allowable--and we immediately repaid both loans in full
with interest on February 7, 1986.

In other words, we made an unintentional mistake, dis-
covered it on our own and corrected it the best way we knew
how, all prior to any notification from the FEC of our error.

As further evidence of our lack of intention to violate
the law, we clearly reported both loans from Dr. Raba as just
that--loans. And we reported his \$1,000 contribution as just
that--a contribution. Thereafter, we amended our report to
show the loans as excessive contributions on the direct
instruction of FEC staff. We initially reported them honestly
(albeit ignorantly) as exactly what they were--loans.

7224 Blanco Road, San Antonio, Texas 78216 ★ (512) 340-1986

Paid for by Friends of Jeff Wentworth

37040643070

Honorable Joan D. Aikens
September 15, 1986
Page Two

It was not until March 18, 1986, that the FEC informed us that they were aware of our apparent violation.

And by that time, we had already repaid both loans in full with interest. Enclosed are copies of relevant correspondence as well as a photocopy of both sides of both cancelled checks involved.

I truly hope this explanation of our honest mistake will clear up this unfortunate incident.

Sincerely,

James E. McCann, Jr.

James E. McCann, Jr., C.P.A.
Treasurer

STATE OF TEXAS §

COUNTY OF BEXAR §

The undersigned states under oath: "I am James E. McCann, Jr., Treasurer of the Friends of Jeff Wentworth Committee. I have personal knowledge of the facts stated in the foregoing letter, and they are true and correct."

James E. McCann, Jr.
James E. McCann, Jr.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 15th day of September, 1986.

Donna Kay McKinney
Notary Public, State of Texas
My commission expires: 2-8-88
DONNA KAY MCKINNEY

37047646971



February 7, 1986

Dr. Carl F. Raba, Jr.
Raba-Kistner Consultants
12821 West Golden Lane
San Antonio, Texas 78249

★Dear Dr. Raba:

It has come to our attention that the loans you made to the Friends of Jeff Wentworth Committee are not allowed under the federal campaign laws. We are, therefore, repaying the loans in full plus interest.

Enclosed is a check in the amount of \$5,250.50 to repay the loan dated September 10, 1985, and a check in the amount of \$3,045.00 in repayment of the second loan dated December 24, 1985.

Please acknowledge receipt of this letter and the checks.

Sincerely,

James E. McCann, Jr.
James E. McCann, Jr.
Treasurer

COMMERCIAL
NATIONAL
BANK



P.O. BOX 16016
SAN ANTONIO, TX 78216

FRIENDS OF JEFF WENTWORTH

P. O. BOX 32948 (512) 340-1986
SAN ANTONIO, TEXAS 78216

494

Feb. 7 1986

PAY TO THE
ORDER OF

Carl J. Raba Jr.

Five thousand two hundred fifty and 50/100 \$ 5,250⁵⁰
DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS

Repayment of \$5,000 loan

Interest of \$250⁵⁰

COMMERCIAL NATIONAL BANK
SAN ANTONIO, TEXAS

⑈000494⑈ ⑆111401111512⑈ 100 349 5⑈

⑈0000525050⑈

Jeffrey Wentworth

COMMERCIAL
NATIONAL
BANK



P.O. BOX 16016
SAN ANTONIO, TX 78216

FRIENDS OF JEFF WENTWORTH

P. O. BOX 32948 (512) 340-1986
SAN ANTONIO, TEXAS 78216

495

Feb. 7 1986

PAY TO THE
ORDER OF

Carl J. Raba Jr.

Three thousand forty-five and 00/100 \$ 3,045⁰⁰
DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS

Repayment of \$3,000 loan

Interest of \$45⁰⁰

COMMERCIAL NATIONAL BANK
SAN ANTONIO, TEXAS

⑈000495⑈ ⑆111401111512⑈ 100 349 5⑈

⑈0000304500⑈

Jeffrey Wentworth

For Deposit Only
Carl F. Raloff

1111 30961

REC-103

PAY ANY BANK
COST NATL BANK
SAN ANTONIO, TX

11-01-65

PAY ANY BANK
COST NATL BANK
SAN ANTONIO, TX

111108822

For Deposit Only
Carl F. Raloff

1111 30962

REC-103

PAY ANY BANK
COST NATL BANK
SAN ANTONIO, TX

11-01-65

PAY ANY BANK
COST NATL BANK
SAN ANTONIO, TX

4 7 6 3 4 3 0 1 0 7 8

Mr. James E. McCann, Jr.
Treasurer
Friends of Jeff Wentworth
P.O. Box 32948
San Antonio, Texas 78216

Dear Mr. McCann:

This is to acknowledge receipt of your letter dated February 7, 1986, and two checks in the amounts of \$5,250.50 and \$3,045.00 in repayment of the loans mentioned in your letter.

These checks constitute payment in full of these obligations.

Sincerely,

Carl F. Raba, Jr., Ph.D.

87040643375

★★JEFF★★
WENTWORTH
CONGRESS

February 11, 1986

Clerk of the House
U.S. House of Representatives
1036 Longworth House Office Building
Washington, D.C. 20515

★Dear Sir:

Re: C00196733
January 31 Year End Report
Schedule C
Line Number 13(b), Page 1

We have discovered that the loans listed in Item B
from Carl F. Raba, Jr., are not allowed under federal
election campaign laws.

Immediate steps were taken, and those loans have been
repaid in full with interest.

Sincerely,

James E. McCann, Jr.
James E. McCann, Jr.
Treasurer

CERTIFIED MAIL NO. P 594 282 013
RETURN RECEIPT REQUESTED

7224 Blanco Road, San Antonio, Texas 78216 ★ (512) 340-1986

Paid for by Friends of Jeff Wentworth

97047543975



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 18 1986

James E. McCann Jr., Treasurer
Friends of Jeff Wentworth
P.O. Box 32948
San Antonio, TX 78216

Identification Number: C00196733

Reference: Year End Report (5/1/85-12/31/85)

Dear Mr. McCann:

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 report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. The Committee for Common Sense appears to be unregistered with the Commission. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §§441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contributions in question were incompletely or incorrectly reported, you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

The Commission notes your intention to repay the \$8,000 loan to Carl F. Raba, Jr. Although the Commission may take further legal steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

370406977

-Please clarify if there are any endorsers for the \$25,000 loan owed to Commercial National Bank disclosed on Schedule C.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Linda Tangney
Reports Analyst
Reports Analysis Division

87040343978

Lancer Corporation
235 West Turbo
San Antonio, Texas 78216
Telephone (512) 344-3071

Federal Election Commission
Attention: Linda Tangney
Washington D.C. 20463

Dear Mrs. Tangney

Enclosed are amendments for the following
reports for the Friends of Jeff McIntireworth
Committee:
January 31 Year End Report
April 15 Quarterly Report

The amendments reflect the problems noted
in your latest correspondence to one dated
April 10, 1986. Specifically, these problems
and the action taken are as follows:

- (1) The \$8,000 reported as loans from Mr.
Carl Kaba have now been reflected
as contributions. The repayments have
been reflected as refunds of contributions.
As discussed, this was an oversight
on our part, not realizing loans from
individuals were defined as contributions.
These were paid back as soon as we
became aware of the problem.

LANCER

3704064397

Lancer Corporation
235 West Turbo
San Antonio, Texas 78216
Telephone (512) 344-3071

- (2) The excess contribution of \$1,000 made by the Committee for Common Sense is now reflected as being an outstanding debt for those periods. Our investigation confirmed your statement that the committee was not a multiple candidate committee and therefore limited to \$1,000 an election.

If there are any questions concerning these matters, please do not hesitate to call me at 512-344-3071.

Sincerely,

James S. McLarny
Treasurer - Federal
of Jeff Wentworth

**REPORTS OF RECEIPTS AND DISBURSEMENT
For Authorized Committee**

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (in Full) Friends of Jeff Wentworth	2. FEC Identification Number C00196733
Address (Number and Street) P. O. Box 32948	3. Is this Report an Amendment? ☒ YES ☐ NO
City, State and Zip Code San Antonio, Texas 78216	☐ Check if address is different than previously reported.

4. TYPE OF REPORT

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

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	5-1-86 through 12-31-86		
6. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (From Line 11 (e))		108,417.20	108,417.20
(b) Total Contribution Refunds (from Line 20 (d))		--	--
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))		108,417.20	108,417.20
7. Net Operating Expenditures			
(a) Total Operating Expenditures (from Line 17)		128,979.61	128,979.61
(b) Total Offsets to Operating Expenditures (from Line 14)		496.30	496.30
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))		128,483.31	128,483.31
8. Cash on Hand at Close of Reporting Period (from Line 27)		4,947.09	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		--	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		34,515.14	

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

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

James E. McCann, Jr.
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

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

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

	FEC FORM 3 (3/80)
--	-------------------

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in Full)
Friends of Jeff Wentworth

Report Covering the Period:
From: **5-1-85** To: **12-31-85**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

- (a) Individuals/Persons Other Than Political Committees
(Memo Entry Unitemized \$ 9,525.00)
(b) Political Party Committees
(c) Other Political Committees
(d) The Candidate
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c)
and 11(d)).

97,117.20 **97,117.20**

11 (a)

-- **--**

11 (b)

9,050.00 **9,050.00**

11 (c)

2,250.00 **2,250.00**

11 (d)

108,417.20 **108,417.20**

11 (e)

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

-- **--**

12

13. LOANS:

- (a) Made or Guaranteed by the Candidate
(b) All Other Loans
(c) TOTAL LOANS (add 13 (a) and 13 (b)).

25,000.00 **25,000.00**

13 (a)

-- **--**

13 (b)

25,000.00 **25,000.00**

13 (c)

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

496.30 **496.30**

14

15. OTHER RECEIPTS (Dividends, Interest, etc.)

13.20 **13.20**

15

16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)

133,926.70 **133,926.70**

16

II. DISBURSEMENTS

17. OPERATING EXPENDITURES

128,979.61 **128,979.61**

17

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES

-- **--**

18

19. LOAN REPAYMENTS:

- (a) Of Loans Made or Guaranteed by the Candidate
(b) Of All Other Loans
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b)).

-- **--**

19 (a)

-- **--**

19 (b)

-- **--**

19 (c)

20. REFUNDS OF CONTRIBUTIONS TO:

- (a) Individuals/Persons Other Than Political Committees
(b) Political Party Committees
(c) Other Political Committees
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))

-- **--**

20 (a)

-- **--**

20 (b)

-- **--**

20 (c)

-- **--**

20 (d)

21. OTHER DISBURSEMENTS

-- **--**

21

22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)

128,979.61 **128,979.61**

22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD

\$ --

23

24. TOTAL RECEIPTS THIS PERIOD (From Line 16)

\$ 133,926.70

24

25. SUBTOTAL (Add Line 23 and Line 24)

\$ 133,926.70

25

26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)

\$ 128,979.61

26

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) \$

4,947.09

27

SCHEDULE A

ITEMIZED RECEIPTS

 LINE NUMBER 11 (a)
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)

Friends of Jeff Wentworth

A. Full Name, Mailing Address and ZIP Code Ms. Nancy Jean Raba 198 Oakwell Farms #3008 San Antonio, Texas 78216 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Self-Employed Occupation Real Estate Agent Aggregate Year-to-Date—\$ 1,000.00	Date (month, day, year) 12/19/85	Amount of Each Receipt this Period \$ 1,000.00
B. Full Name, Mailing Address and ZIP Code Mrs. Carl F. Raba, Jr. 10526 Gulfdale San Antonio, Texas 78216 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Raba-Kistner Consultants Occupation Executive Aggregate Year-to-Date—\$ 1,000.00	Date (month, day, year) 08/22/85	Amount of Each Receipt This Period \$ 1,000.00
C. Full Name, Mailing Address and ZIP Code Carl F. Raba, Jr. 10526 Gulfdale San Antonio, Texas 78216 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Raba-Kistner Consultants Occupation Engineer Aggregate Year-to-Date—\$ 9,000.00 (a) to be refunded	Date (month, day, year) 08/22/85 09/10/85 09/10/85	Amount of Each Receipt This Period \$ 1,000.00 (a) 5,000.00 (a) 3,000.00
D. Full Name, Mailing Address and ZIP Code L. S. Reed Route 3, Box 3309 Boerne, Texas 78006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Requested Occupation Requested Aggregate Year-to-Date—\$ 300.00	Date (month, day, year) 10/11/85	Amount of Each Receipt This Period \$ 300.00
E. Full Name, Mailing Address and ZIP Code Joel V. Reitzer, Jr. 118 Algerita San Antonio, Texas 78230 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Joel Reitzer & Associates Occupation Architect Aggregate Year-to-Date—\$ 500.00	Date (month, day, year) 10/11/85	Amount of Each Receipt This Period \$ 500.00
F. Full Name, Mailing Address and ZIP Code Joseph Satel 111 Canterbury Hill San Antonio, Texas 78209 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Satel's Occupation Retailer Aggregate Year-to-Date—\$ 250.00	Date (month, day, year) 10/29/85	Amount of Each Receipt This Period \$ 250.00
G. Full Name, Mailing Address and ZIP Code Mrs. Cecil C. Scanlan 915 Alamo National Building San Antonio, Texas 78205 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation Homemaker Aggregate Year-to-Date—\$ 1,000.00	Date (month, day, year) 12/01/85	Amount of Each Receipt This Period \$ 1,000.00
SUBTOTAL of Receipts This Page (optional).			
TOTAL This Period (last page this line number only)			

attachments
(part 1)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Joseph W. Russell, Esquire
Foster, Lewis, Langley, Gardner & Banack
16th Floor
Frost Bank Tower
San Antonio, Texas 78205

RE: MUR 2224
Carl Raba, Jr.

Dear Mr. Russell:

On August 19, 1986, the Commission found reason to believe that Carl F. Raba, Jr. violated 2 U.S.C. § 441a(a)(1). At your request, the Commission determined on , 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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosures

97040543984

Ccc# 1593

★ ★ JEFF ★ ★
WENTWORTH
CONGRESS

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

SEP 22 P 4: 27

September 15, 1986

Honorable Joan D. Aikens
Chairman
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

Re: MUR 2224

Friends of Jeff Wentworth and
James E. McCann, Jr., as treasurer

★
Dear Ms. Aikens:

Thank you for your recent letter which I received on
September 2 after returning from a Labor Day holiday weekend.

I have today requested pre-probable cause conciliation
of this matter, which request was made to Mr. Charles Steele,
General Counsel of the Federal Election Commission.

The two loans totalling \$8,000 from Dr. Carl F. Raba, Jr.
were accepted by the Friends of Jeff Wentworth Committee in
the mistaken belief that loans could be legally taken from
any source so long as they were actually repaid and that the
loans were made at the prevailing commercial interest rate
at the time they were made.

Subsequent to our accepting these two loans and prior to
any communication whatever, oral or written, with the Federal
Election Commission, we discovered while reviewing provisions
of the Federal Election Campaign Act that what we had done was
not allowable--and we immediately repaid both loans in full
with interest on February 7, 1986.

In other words, we made an unintentional mistake, dis-
covered it on our own and corrected it the best way we knew
how, all prior to any notification from the FEC of our error.

As further evidence of our lack of intention to violate
the law, we clearly reported both loans from Dr. Raba as just
that--loans. And we reported his \$1,000 contribution as just
that--a contribution. Thereafter, we amended our report to
show the loans as excessive contributions on the direct
instruction of FEC staff. We initially reported them honestly
(albeit ignorantly) as exactly what they were--loans.

Honorable Joan D. Aikens
September 15, 1986
Page Two

It was not until March 18, 1986, that the FEC informed us that they were aware of our apparent violation.

And by that time, we had already repaid both loans in full with interest. Enclosed are copies of relevant correspondence as well as a photocopy of both sides of both cancelled checks involved.

I truly hope this explanation of our honest mistake will clear up this unfortunate incident.

Sincerely,

James E. McCann Jr.
James E. McCann, Jr., C.P.A.
Treasurer

STATE OF TEXAS §

COUNTY OF BEXAR §

The undersigned states under oath: "I am James E. McCann, Jr., Treasurer of the Friends of Jeff Wentworth Committee. I have personal knowledge of the facts stated in the foregoing letter, and they are true and correct."

James E. McCann Jr.
James E. McCann, Jr.

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 15th day of September, 1986.

Donna Kay McKinney
Notary Public, State of Texas
My commission expires: 2-8-88
DONNA KAY MCKINNEY

370404.000

★★JEFF★★
WENTWORTH

7224 Blanco Road, San Antonio, Texas 78216

CERTIFIED

P 594 282 023

MAIL

RETURN RECEIPT REQUESTED

Hon. Joan D. Aikens
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463



★★JEFF★★
WENTWORTH
CONGRESS

February 7, 1986

Dr. Carl F. Raba, Jr.
Raba-Kistner Consultants
12821 West Golden Lane
San Antonio, Texas 78249

★Dear Dr. Raba:

It has come to our attention that the loans you made to the Friends of Jeff Wentworth Committee are not allowed under the federal campaign laws. We are, therefore, repaying the loans in full plus interest.

Enclosed is a check in the amount of \$5,250.50 to repay the loan dated September 10, 1985, and a check in the amount of \$3,045.00 in repayment of the second loan dated December 24, 1985.

Please acknowledge receipt of this letter and the checks.

Sincerely,

James E. McCann, Jr.
James E. McCann, Jr.
Treasurer

COMMERCIAL
NATIONAL
BANK

P.O. BOX 14016
SAN ANTONIO, TX 78216



FRIENDS OF JEFF WENTWORTH
P. O. BOX 32948 (512) 340-1986
SAN ANTONIO, TEXAS 78216

494

Feb. 7 1986

PAY TO THE
ORDER OF

Carl J. Raba, Jr.
Five thousand two hundred fifty and 50/100 \$ 5,250⁵⁰
DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS

Repayment of \$5,000 loan FEB 1 1986 XXX

Interest of \$250⁰⁰ COMMERCIAL NATIONAL BANK

SAN ANTONIO, TEXAS

⑈000494⑈ ⑆114016⑆ 51 100 349 5⑈

⑈0000525050⑈

Jeffrey Wentworth

COMMERCIAL
NATIONAL
BANK

P.O. BOX 14016
SAN ANTONIO, TX 78216



FRIENDS OF JEFF WENTWORTH
P. O. BOX 32948 (512) 340-1986
SAN ANTONIO, TEXAS 78216

495

Feb. 7 1986

PAY TO THE
ORDER OF

Carl J. Raba, Jr.
Three thousand forty-five and 00/100 \$ 3,045⁰⁰
DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS

Repayment of \$3,000 loan FEB 1 1986 XXX

Interest of \$45⁰⁰ COMMERCIAL NATIONAL BANK

SAN ANTONIO, TEXAS

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⑈0000304500⑈

Jeffrey Wentworth

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ANTONIO, TX

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SAN ANTONIO, TX

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Mr. James E. McCann, Jr.
Treasurer
Friends of Jeff Wentworth
P.O. Box 32948
San Antonio, Texas 78216

Dear Mr. McCann:

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These checks constitute payment in full of these obligations.

Sincerely,

Carl F. Raba, Jr., Ph.D.

37047:4:991



February 11, 1986

Clerk of the House
U.S. House of Representatives
1036 Longworth House Office Building
Washington, D.C. 20515

★Dear Sir:

Re: C00196733
January 31 Year End Report
Schedule C
Line Number 13(b), Page 1

We have discovered that the loans listed in Item B
from Carl F. Raba, Jr., are not allowed under federal
election campaign laws.

Immediate steps were taken, and those loans have been
repaid in full with interest.

Sincerely,

James E. McCann, Jr.
James E. McCann, Jr.
Treasurer

CERTIFIED MAIL NO. P 594 282 013
RETURN RECEIPT REQUESTED



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 18 1986

James E. McCann Jr., Treasurer
Friends of Jeff Wentworth
P.O. Box 32948
San Antonio, TX 78216

Identification Number: C00196733

Reference: Year End Report (5/1/85-12/31/85)

Dear Mr. McCann:

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 report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. The Committee for Common Sense appears to be unregistered with the Commission. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §§441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contributions in question were incompletely or incorrectly reported, you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

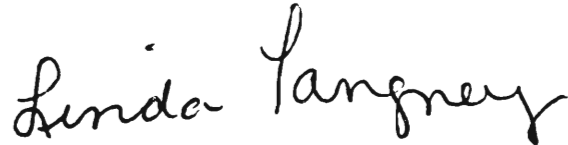
The Commission notes your intention to repay the \$8,000 loan to Carl F. Raba, Jr. Although the Commission may take further legal steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

97040343993

-Please clarify if there are any endorsers for the \$25,000 loan owed to Commercial National Bank disclosed on Schedule C.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Linda Tangney
Reports Analyst
Reports Analysis Division

87040643994

Lancer Corporation
235 West Turbo
San Antonio, Texas 78216
Telephone (512) 344-3071

Federal Election Commission
Attention: Linda Tangney
Washington D.C. 20463

Dear Ms. Tangney

Enclosed are amendments for the following
reports for the Friends of Jeff McIntworth
Committee:

January 31 Year End Report
April 15 Quarterly Report

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in your latest correspondence to me dated
April 10, 1986. Specifically, these problems
and the action taken are as follows:

- (1) The \$8,000 reported as loans from Mr.
Carl Kaba have now been reflected
as contributions. The repayments have
been reflected as refunds of contributions.
As discussed, this was an oversight
on our part, not realizing loans from
individuals were defined as contributions.
These were paid back as soon as we
became aware of the problem.

LANCER

870404399

Lancer Corporation
235 West Turbo
San Antonio, Texas 78216
Telephone (512) 344-3071

(2) The excess contribution of \$1,000 made by the Committee for Common Sense is now reflected as being an outstanding debt for those periods. Our investigation confirmed your statement that the committee was not a multiple candidate committee and therefore limited to \$1,000 an election.

LANCER

If there are any questions concerning these matters, please do not hesitate to call me at 512-344-3071.

Sincerely,

James S. McLarny,
Treasurer - Friends
of Jeff Wentworth

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (in Full) Friends of Jeff Wentworth	2. FEC Identification Number C00196733
Address (Number and Street) P. O. Box 32948	3. Is this Report an Amendment? ☒ YES ☐ NO
City, State and Zip Code San Antonio, Texas 78216	☐ Check if address is different than previously reported.

4. TYPE OF REPORT

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

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

SUMMARY		COLUMN A	COLUMN B
		This Period	Calendar Year-to-Date
5. Covering Period	<u>5-1-86</u> through <u>12-31-86</u>		
6. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (From Line 11 (e))		108,417.20	108,417.20
(b) Total Contribution Refunds (from Line 20 (d))		--	--
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))		108,417.20	108,417.20
7. Net Operating Expenditures			
(a) Total Operating Expenditures (from Line 17)		128,979.61	128,979.61
(b) Total Offsets to Operating Expenditures (from Line 14)		496.30	496.30
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))		128,483.31	128,483.31
8. Cash on Hand at Close of Reporting Period (from Line 27)		4,947.09	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		--	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		34,515.14	

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

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

James E. McCann, Jr.
Type or Print Name of Treasurer

SIGNATURE OF TREASURER _____ Date _____

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

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

	FEC FORM 3 (3/80)
--	-------------------

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in Full)

Friends of Jeff Wentworth

Report Covering the Period:

From: 5-1-85

To: 12-31-85

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

- (a) Individuals/Persons Other Than Political Committees
(Memo Entry Unitemized \$ 9,525.00)
- (b) Political Party Committees
- (c) Other Political Committees
- (d) The Candidate
- (e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d)).

COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
97,117.20	97,117.20
--	--
9,050.00	9,050.00
2,250.00	2,250.00
108,417.20	108,417.20

11 (a)
11 (b)
11 (c)
11 (d)
11 (e)

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

-- --

12

13. LOANS:

- (a) Made or Guaranteed by the Candidate
- (b) All Other Loans
- (c) TOTAL LOANS (add 13 (a) and 13 (b)).

25,000.00	25,000.00
--	--
25,000.00	25,000.00

13 (a)
13 (b)
13 (c)

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

496.30 496.30

14

15. OTHER RECEIPTS (Dividends, Interest, etc.)

13.20 13.20

15

16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)

133,926.70 133,926.70

16

II. DISBURSEMENTS

17. OPERATING EXPENDITURES

128,979.61 128,979.61

17

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES

-- --

18

19. LOAN REPAYMENTS:

- (a) Of Loans Made or Guaranteed by the Candidate
- (b) Of All Other Loans
- (c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b)).

--	--
--	--
--	--

19 (a)
19 (b)
19 (c)

20. REFUNDS OF CONTRIBUTIONS TO:

- (a) Individuals/Persons Other Than Political Committees
- (b) Political Party Committees
- (c) Other Political Committees
- (d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))

--	--
--	--
--	--
--	--

20 (a)
20 (b)
20 (c)
20 (d)

21. OTHER DISBURSEMENTS

-- --

21

22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)

128,979.61 128,979.61

22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD

\$ --

23

24. TOTAL RECEIPTS THIS PERIOD (From Line 16)

\$ 133,926.70

24

25. SUBTOTAL (Add Line 23 and Line 24)

\$ 133,926.70

25

26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)

\$ 128,979.61

26

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) \$

4,947.09

27

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 11 (a)
(Use separate schedule(s) for each
category of the Detailed
Summary Page)

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

Name of Committee (in Full)

Friends of Jeff Wentworth

A. Full Name, Mailing Address and ZIP Code Ms. Nancy Jean Raba 198 Oakwell Farms #3008 San Antonio, Texas 78216	Name of Employer Self-Employed Occupation Real Estate Agent	Date (month, day, year) 12/19/85	Amount of Each Receipt this Period \$ 1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date —\$ 1,000.00		
B. Full Name, Mailing Address and ZIP Code Mrs. Carl F. Raba, Jr. 10526 Gulfdale San Antonio, Texas 78216	Name of Employer Raba-Kistner Consultants Occupation Executive	Date (month, day, year) 08/22/85	Amount of Each Receipt This Period \$ 1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date —\$ 1,000.00		
C. Full Name, Mailing Address and ZIP Code Carl F. Raba, Jr. 10526 Gulfdale San Antonio, Texas 78216	Name of Employer Raba-Kistner Consultants Occupation Engineer	Date (month, day, year) 08/22/85 09/10/85 09/10/85	Amount of Each Receipt This Period \$ 1,000.00 (a) 5,000.00 (a) 3,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date —\$ 9,000.00 (a) to be refunded		
D. Full Name, Mailing Address and ZIP Code L. S. Reed Route 3, Box 3309 Boerne, Texas 78006	Name of Employer Requested Occupation Requested	Date (month, day, year) 10/11/85	Amount of Each Receipt This Period \$ 300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date —\$ 300.00		
E. Full Name, Mailing Address and ZIP Code Joel V. Reitzer, Jr. 118 Algerita San Antonio, Texas 78230	Name of Employer Joel Reitzer & Associates Occupation Architect	Date (month, day, year) 10/11/85	Amount of Each Receipt This Period \$ 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date —\$ 500.00		
F. Full Name, Mailing Address and ZIP Code Joseph Satel 111 Canterbury Hill San Antonio, Texas 78209	Name of Employer Satel's Occupation Retailer	Date (month, day, year) 10/29/85	Amount of Each Receipt This Period \$ 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date —\$ 250.00		
G. Full Name, Mailing Address and ZIP Code Mrs. Cecil C. Scanlan 915 Alamo National Building San Antonio, Texas 78205	Name of Employer N/A Occupation Homemaker	Date (month, day, year) 12/01/85	Amount of Each Receipt This Period \$ 1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date —\$ 1,000.00		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

97040000

attchment
(part 2)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth Committee
7224 Blanco Road
San Antonio, Texas 78216

RE: MUR 2224
Friends of Jeff Wentworth
Committee and James E.
McCann, Jr., as treasurer

Dear Mr. McCann:

On August 19, 1986, the Commission found reason to believe that the Friends of Jeff Wentworth Committee and you, as treasurer, violated 2 U.S.C. § 441a(f). At your request, the Commission determined on , 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 you 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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosures

97017741000

★ ★ JEFF ★ ★
WENTWORTH
CONGRESS

RECEIVED AT THE FEC
GCC 15/8
86 SEP 22 P 2:19

September 15, 1986

Mr. Charles Steele
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

★ Dear Mr. Steele:

In connection with MUR 2224, Friends of Jeff Wentworth and James E. McCann, Jr., as treasurer, I hereby respectfully request pre-probable cause conciliation of this matter.

Sincerely,

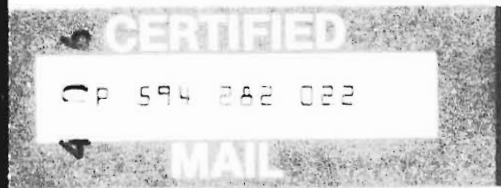
James E. McCann, Jr.
James E. McCann, Jr., C.P.A.
Treasurer

Certified Mail No. P 594 282 022
Return Receipt Requested

86 SEP 22 P 3:41

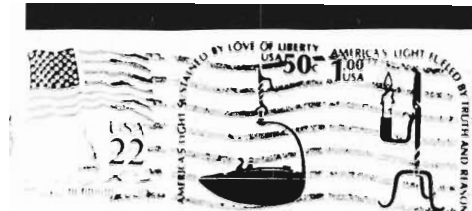
★★JEFF★★ WENTWORTH

224 Blanco Road, San Antonio, Texas 78216



RETURN RECEIPT REQUESTED

Mr. Charles Steele
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463



00 SEP 22

2:18

CCC#1535
RECEIVED AT THE FEC
HAND DELIVERED
86 SEP 17 11:20

FOSTER, LEWIS, LANGLEY, GARDNER & BANACK

INCORPORATED
ATTORNEYS AT LAW
SIXTEENTH FLOOR
FROST BANK TOWER
SAN ANTONIO, TEXAS 78205

(512) 226-3116

GEORGE A. OLSON, F.

September 16, 1986

RALPH LANGLEY
PAT H. GARDNER
A. J. LEWIS, JR.
EMERSON BANACK, JR.
CHARLES R. ROBERTS
EDWARD KLEWER III
RICHARD L. KERR
WILLIAM T. ARMSTRONG III
JOSEPH W. RUSSELL
JAMES E. WILLINGHAM, JR.
KENNETH L. MALONE
RONALD B. KING
ROBERT RUSSO
A. J. LEWIS III
SCOTT E. BREEN
KAREN M. VAUGHAN

JOHN B. STEWART
HARRY W. WOLFF, JR.
RICHARD D. BLAU
RANDALL H. ERBEN
MICHAEL R. GARATONI
WILLIAM G. SHOWN
ROSEMARY L. HOLLAN
JAMES K. LOWRY, JR.
DALE WILSON
SUSAN L. GELLIS
WILL C. JONES III
NAN R. SEIDENFELD
PETER L. KILPATRICK
R. FLINT BOURGEOIS
THOMAS M. PICKFORD, JR.

BEN F. FOSTER, JR.
A. J. LEWIS, JR.

TELECOPIER
(512) 226-1065

SEP 17 11:03

AIRBORNE FREIGHT

Office of General Counsel
Federal Election Commission
Attention: Mr. Charles Snyder
999 "E" Street, N.W.
Washington, D.C. 20463

Re: MUR 2224, Carl F. Raba, Jr.

Dear Mr. Snyder:

Pursuant to our telephone conference of September 12, 1986, I am sending this letter to request "pre probable cause conciliation" with respect to this matter.

My client, Carl F. Raba, Jr., made the two loans in question in complete innocence and good faith. It was at all times fully intended by Carl F. Raba, Jr., that both the loans would be fully repaid.

In fact, the loans were repaid with interest, and no benefit of any amount was conferred on the Jeff Wentworth Political Committee.

Accordingly, in our view this presents a clear case of unintentional error committed through ignorance of a technical provision of the law, and though there may be a technical violation, there should be no sanctions imposed in view of the fact that no tangible dollar amount of benefit was conferred on the Political Committee.

We will be happy to furnish further information and to consult with you further regarding any aspect of this matter.

Thank you very much for your attention to this matter.

Yours truly,

Joseph W. Russell

JWR/smk

cc: Carl F. Raba, Jr.

RECEIVED BY THE FEO
GCC# 1437
06 SEP 86 12:01

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2224
NAME OF COUNSEL: Joseph W. Russell
ADDRESS: FOSTER, LEWIS, LANGLEY, GARDNER & BANACK
1655 Frost Bank Tower
San Antonio, Texas 78205
TELEPHONE: 512 226-3116

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

September 2, 1986
Date

Carl F. Raba, Jr.
Signature

RESPONDENT'S NAME: Carl F. Raba, Jr.
ADDRESS: 12821 Golden Lane
San Antonio, Texas 78249
HOME PHONE: 512 684-3709
BUSINESS PHONE: 512 699-9090

-6 SEP 9 A10:45

37010044004



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 22, 1986

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth Committee
P.O. Box 32948
San Antonio, Texas 78216

RE: MUR 2224
Friends of Jeff Wentworth and
James E. McCann, Jr., as
treasurer

Dear Mr. McCann:

On August 19, 1986, the Federal Election Commission determined that there is reason to believe Friends of Jeff Wentworth Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you 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. Statements should be submitted under oath.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so

that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

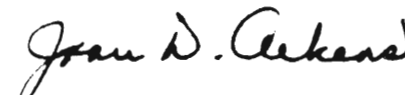
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

cc: Jeff Wentworth

37010041003

ba-Kistner
Consultants, Inc.

P.O. Box 690287
San Antonio, TX 78269-0287



Charles Snyder
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

7 0 0 0 4 1 7



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 22, 1986

Carl F. Raba, Jr.
12821 Golden Lane
San Antonio, Texas 78249

RE: MUR 2224
Carl F. Raba, Jr.

Dear Mr. Raba:

On August 19, 1986, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter. Statements should be submitted under oath.

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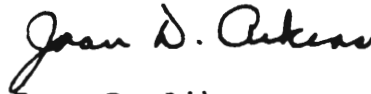
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Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

971174:000



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Carl F. Raba, Jr.
12821 Golden Lane
San Antonio, Texas 78249

RE: MUR
Carl F. Raba, Jr.

Dear Mr. Raba:

On , 198 , the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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Sincerely,

Joan D. Aikens
Chairman

Enclosures

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

copy 8/6/1

87040644011

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

STAFF MEMBER & TEL. NO.
Charles Snyder (202) 376-8200

RESPONDENT: Carl F. Raba, Jr.

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that the Friends of Jeff Wentworth Committee ("FJW") and its treasurer accepted an excessive contribution from Carl F. Raba, Jr.

According to RAD, FJW, the principal authorized campaign committee of Jeff Wentworth during his campaign for the Republican nomination for Congress from the 21st district of Texas, accepted the following contributions from Mr. Raba:

1. a \$1,000 contribution, received August 22, 1985;
2. a \$5,000 loan, received September 10, 1985; and
3. a \$3,000 loan, received December 24, 1985.

Both loans were designated for the primary election. Thus it is alleged that Mr. Raba made, and FJW accepted, an excessive contribution of \$8,000.

FACTUAL AND LEGAL ANALYSIS

Under the Federal Election Campaign Act ("the Act")

(a)(1) No person shall make contributions - (A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000....

8704044012

2 U.S.C. § 441a. The Act defines the term "contribution" to include:

(i) any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office..

2 U.S.C. § 431(8)(A) (emphasis added).

Since Mr. Raba lent FJW \$8,000 in addition to giving the committee the maximum individual contribution of \$1,000, it appears that Mr. Raba made an excessive contribution of \$8,000 in violation of 2 U.S.C. § 441a(a)(1).

87040544013



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth Committee
P.O. Box 32948
San Antonio, Texas 78216

RE: MUR
Friends of Jeff Wentworth and
James E. McCann, Jr., as
treasurer

Dear Mr. McCann:

On , 198 , the Federal Election Commission determined that there is reason to believe Friends of Jeff Wentworth Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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97040544014

that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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Sincerely,

Joan D. Aikens
Chairman

Enclosures

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

cc: Jeff Wentworth

Handwritten initials and date: JAW 8/21

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

STAFF MEMBER & TEL. NO.
Charles Snyder (202) 376-8200

RESPONDENT: Friends of Jeff Wentworth Committee and James E. McCann, Jr., as treasurer

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that the Friends of Jeff Wentworth Committee ("FJW") and its treasurer accepted an excessive contribution from Carl F. Raba, Jr.

According to RAD, FJW, the principal authorized campaign committee of Jeff Wentworth during his campaign for the Republican nomination for Congress from the 21st district of Texas, accepted the following contributions from Mr. Raba:

1. a \$1,000 contribution, received August 22, 1985;
2. a \$5,000 loan, received September 10, 1985; and
3. a \$3,000 loan, received December 24, 1985.

Both loans were designated for the primary election. Thus it is alleged that Mr. Raba made, and FJW accepted, an excessive contribution of \$8,000.

FACTUAL AND LEGAL ANALYSIS

Under the Federal Election Commission Campaign Act ("the Act")

(a) (1) No person shall make contributions - (A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000....

(f) No candidate or political committee shall knowingly accept any contribution ... in violation of the provisions of this section.

2 U.S.C. § 441a. The Act defines the term "contribution" to include:

(i) any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office..

2 U.S.C. § 431(8)(A) (emphasis added).

Since Mr. Raba loaned FJW \$8,000 in addition to giving the committee the maximum individual contribution of \$1,000, it appears that FJW violated 2 U.S.C. § 441a(f) by accepting this \$8,000 excessive contribution.

3701741017

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Friends of Jeff Wentworth Committee
and James F. McCann, Jr., as
treasurer;
Carl F. Raba, Jr.

)
)
) RAD 86L-9 (MUR 2224)
)
)
)

CERTIFICATION

9 7 0 4 0 5 4 1 0 1 3
I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of August 19,
1986, do hereby certify that the Commission decided by a
vote of 5-1 to take the following actions in the above-
captioned matter:

1. Open a Matter Under Review (MUR).
2. Find reason to believe that the Friends of
Jeff Wentworth Committee and James E. McCann,
Jr., as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Carl F. Raba, Jr.
violated 2 U.S.C. § 441a(a)(1).
4. Approve and send the letters and General
Counsel's Legal and Factual Analyses attached
to the General Counsel's report dated August 6,
1986.

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

Attest:

8-20-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/CHERYL A. FLEMING (147)
DATE: AUGUST 8, 1986
SUBJECT: OBJECTION TO RAD 86L-9: FIRST GENERAL COUNSEL'S
SIGNED AUGUST 6, 1986

3 7 1 1 0 4 1 0 1 7
The above-named document was circulated to the
Commission on Thursday, August 7, 1986 at 4:00 P.M.

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

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u> </u>
Commissioner Harris	<u> </u>
Commissioner Josefiak	<u> </u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>

This matter will be placed on the Executive Session
agenda for Tuesday, August 19, 1986.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *red*
DATE: August 7, 1986
SUBJECT: RAD Referral 86L-9 - First General Counsel's Rpt.

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒ Sensitive ☒
Non-Sensitive ☐
24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐
Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐
Litigation ☐
Closed MUR Letters ☐
Status Sheets ☐
Advisory Opinions ☐
Other (see distribution below) ☐

FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

FIRST GENERAL COUNSEL'S REPORT 00 AUG 7 410:20

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION:

RAD #86L-9
STAFF MEMBER:
Snyder

SENSITIVE

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

RESPONDENTS' NAMES: Friends of Jeff Wentworth Committee and
James F. McCann, Jr., as treasurer;
Carl F. Reba, Jr.

RELEVANT STATUTES: 2 U.S.C. §§ 441a, 441a(f), 431(8)(A)

INTERNAL REPORTS
CHECKED: Friends of Jeff Wentworth Committee
reports

FEDERAL AGENCIES
CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that the Friends of Jeff Wentworth Committee ("FJW") and its treasurer accepted an excessive contribution from Carl F. Raba, Jr.

SUMMARY OF ALLEGATIONS

According to RAD, FJW, the principal authorized campaign committee of Jeff Wentworth during his campaign for the Republican nomination for Congress from the 21st district of Texas, accepted the following contributions from Mr. Raba:

1. a \$1,000 contribution, received August 22, 1985;
2. a \$5,000 loan, received September 10, 1985; and
3. a \$3,000 loan, received December 24, 1985.

3704021

Both loans were designated for the primary election.^{1/} Thus it is alleged that Mr. Raba made, and FJW accepted, an excessive contribution of \$8,000.^{2/}

FACTUAL AND LEGAL ANALYSIS

Under the Federal Election Campaign Act ("the Act")

(a)(1) No person shall make contributions - (A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000....

(f) No candidate or political committee shall knowingly accept any contribution ... in violation of the provisions of this section.

2 U.S.C. § 441a. The Act defines the term "contribution" to include:

(1) any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office....

2 U.S.C. § 431(8)(A) (emphasis added).

Since Mr. Raba lent FJW \$8,000 in addition to giving the committee the maximum individual contribution of \$1,000, it appears that Mr. Raba made an excessive contribution of \$8,000 in

^{1/} Mr. Wentworth lost the primary election, held May 3, 1986, receiving 20% of the vote.

^{2/} FJW reported repaying the loans, a total of \$8,000, in its April 1986 Quarterly Report. That report also indicated that FJW paid Mr. Raba \$295.50 in interest.

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violation of 2 U.S.C. § 441a(a)(1). It also appears that FJW violated 2 U.S.C. § 441a(f) by accepting this \$8,000 excessive contribution.

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Friends of Jeff Wentworth Committee and James E. McCann, Jr., as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Carl F. Raba, Jr. violated 2 U.S.C. § 441a(a)(1).
4. Approve and send the attached letters and General Counsel's Legal and Factual Analyses.

Charles N. Steele
General Counsel

Date

8/6/66

BY:

Lawrence M. Noble
Deputy General Counsel

Attachments

1. Referral
2. General Counsel's Legal and Factual Analyses
3. Proposed letters to respondents

37040641023



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

18 June 1986

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 THE FRIENDS OF JEFF WENTWORTH
COMMITTEE

This is a referral of the Friends of Jeff Wentworth Committee (the "Committee"). The Committee accepted a total of \$8,000 in excessive contributions in the form of loans from an individual. According to the 1985-1986 RAD Review and Referral Procedures for Authorized Committees (Standard 2), this matter requires further examination by your office.

The candidate, Jeff Wentworth, lost the primary election held on May 3, 1986 in the twenty-first (21st) congressional district of Texas, receiving twenty percent (20%) of the vote.

If you have any questions, please contact Linda Tangney at 376-2480.

tachment

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 18 June 1986

ANALYST: Linda Tangney

I. COMMITTEE: Friends of Jeff Wentworth Committee
(C00196733)
James E. McCann Jr., Treasurer
P.O. Box 32948
San Antonio, TX 78216

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Acceptance of Excessive Contributions in the Form of Loans

The Friends of Jeff Wentworth Committee (the "Committee") disclosed on its 1985 Year End Report the receipt of a contribution and loans totalling \$9,000 from an individual, Carl F. Raba, Jr. Schedule A of the Committee's report disclosed a \$1,000 contribution from Carl F. Raba, Jr., received on August 22, 1985, with an aggregate year-to-date total of \$1,000, and designated for the primary election (Attachment 2). Schedule C of the Committee's report disclosed a \$5,000 loan incurred on September 10, 1985, and a \$3,000 loan incurred on December 24, 1985, for a total of \$8,000 in loans received from Carl F. Raba, Jr. Both loans were designated for the primary election, had a due date of "demand," and an interest rate of twelve percent (12%) (Attachment 3). The amount of the apparent excessive contribution received from Carl F. Raba, Jr., totalled \$8,000.

On February 11, 1986, the Committee filed an amendment to its 1985 Year End Report. The amendment noted that the loans from Carl F. Raba, Jr. were not allowable "... under federal election campaign laws." The Committee also noted in its amendment, that the loans had been repaid in full, including interest (Attachment 4).

On March 18, 1986, a Request for Additional Information ("RFAI") was mailed to the Committee regarding its 1985 Year End Report. The RFAI informed the Committee of the apparent excessive contributions, and noted its intentions to repay the loans (Attachment 5). No written responses were received, and on April 10, 1986, a Second Notice was mailed to the Committee (Attachment 6).

FRIENDS OF JEFF WENTWORTH COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On April 8, 1986, the treasurer, James McCann, Jr., telephoned to explain that the Committee had repaid the loans in full to Mr. Carl F. Raba, Jr. on February 7, 1986. Mr. McCann stated that he had not known that the loans were actually excessive contributions, and that when he was informed that they were excessive, he immediately took steps to repay the loans. Mr. McCann stated that the loan repayments would appear in the 1986 April Quarterly Report (Attachment 7).

On April 24, 1986, the Committee filed an amendment to its 1985 Year End Report, and filed its 1986 April Quarterly Report. The amended 1985 Year End Report noted in a cover letter that the loans received from Carl F. Raba, Jr., were now reflected as contributions, and that the repayments would be reflected as contribution refunds (Attachment 8). Schedule A, disclosed contributions of \$1,000 received on August 22, 1985, and \$5,000 and \$3,000 received on September 10, 1985, for a total amount of \$9,000 received from Carl F. Raba, Jr. The aggregate year-to-date total was listed as \$9,000 and the contributions were attributed to the primary election (Attachment 9). The amended 1985 Year End Report also included an amended Schedule D to show an \$8,000 debt owed to Mr. Raba and the loans were deleted from Schedule C (Attachment 10).

The Committee's 1986 April Quarterly Report disclosed the \$8,000 contribution refunds in the total disclosed on Line 20(a) of the Detailed Summary Page (Attachment 11). Schedule B, supporting Line 20(a) disclosed contribution refunds of \$5,000 and \$3,000 both made on February 7, 1986 for a total of \$8,000 in contribution refunds to Carl F. Raba, Jr. (Attachment 12). Also, on Schedule B, supporting Line 17 of the Detailed Summary Page, amounts of \$250.50 and \$45, for a total of \$295.50, were disclosed as interest payments to Carl F. Raba, Jr. made on February 7, 1986 (Attachment 13).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1985-1986
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 16JUN86

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
WENTWORTH, JEFF	HOUSE 21	REPUBLICAN PARTY			TEXAS		1986 ELECTION	ID# H2TX23025	
1. STATEMENT OF CANDIDATE									
1985 STATEMENT OF CANDIDATE							17JUL85	1	85HSE/287/3731
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
FRIENDS OF JEFF WENTWORTH									
1985 STATEMENT OF ORGANIZATION									
YEAR-END			133,926		128,979		17JUL85	1	85HSE/287/3728
YEAR-END - AMENDMENT			-		-		1MAY85 -31DEC85	40	86HSE/294/5020
YEAR-END - AMENDMENT			-		-		1MAY85 -31DEC85	1	86HSE/297/3385
YEAR-END - AMENDMENT			-		-		1MAY85 -31DEC85	2	86HSE/303/0926
YEAR-END - AMENDMENT			133,926		128,979		1MAY85 -31DEC85	38	86HSE/303/0928
REQUEST FOR ADDITIONAL INFORMATION							1MAY85 -31DEC85	6	86FEC/405/1357
REQUEST FOR ADDITIONAL INFORMATION 2ND							1MAY85 -31DEC85	7	86FEC/408/1511
1986 48 HOUR CONTRIBUTION NOTICE							19APR86	1	86HSE/302/1558
48 HOUR CONTRIBUTION NOTICE							21APR86	1	86HSE/302/4734
48 HOUR CONTRIBUTION NOTICE							24APR86	1	86HSE/303/1131
48 HOUR CONTRIBUTION NOTICE							28APR86	1	86HSE/303/1650
48 HOUR CONTRIBUTION NOTICE							28APR86	1	86HSE/305/2092
48 HOUR CONTRIBUTION NOTICE							1MAY86	1	86HSE/305/2091
48 HOUR CONTRIBUTION NOTICE							2MAY86	1	86HSE/303/2721
48 HOUR CONTRIBUTION NOTICE							6MAY86	1	86HSE/303/3230
APRIL QUARTERLY			153,941		158,062		1JAN86 -31MAR86	30	86HSE/302/0223
APRIL QUARTERLY - AMENDMENT			153,941		158,062		1JAN86 -31MAR86	30	86HSE/303/0966
APRIL QUARTERLY - AMENDMENT			-		-		1JAN86 -31MAR86	1	86FEC/412/5300
APRIL QUARTERLY - AMENDMENT			-		-		1JAN86 -31MAR86	3	86HSE/304/2592
APRIL QUARTERLY - AMENDMENT			153,941		158,062		1JAN86 -31MAR86	32	86HSE/305/22
REQUEST FOR ADDITIONAL INFORMATION							1JAN86 -31MAR86	2	86FEC/413/5054
REQUEST FOR ADDITIONAL INFORMATION 2ND							1JAN86 -31MAR86	3	86FEC/416/1602
PRE-PRIMARY			35,921		40,060		1APR86 -13APR86	14	86HSE/303/0452
PRE-PRIMARY - AMENDMENT			35,921		40,060		1APR86 -13APR86	16	86HSE/305/2276
NOTICE OF FAILURE TO FILE							1APR86 -13APR86	1	86FEC/412/1276
REQUEST FOR ADDITIONAL INFORMATION							1APR86 -13APR86	2	86FEC/416/0100
TOTAL			323,788	0	327,101	0		237	TOTAL PAGES
4. AUTHORIZED COMMITTEES									
JEFF WENTWORTH FOR CONGRESS COMMITTEE									
1985 MISCELLANEOUS REPORT									
MID-YEAR REPORT				38,818			6DEC85 FROM FEC	1	86FEC/392/1428
MID-YEAR REPORT - AMENDMENT				38,818			1JAN85 -30JUN85	19	86HSE/290/2601
1ST LETTER INFORMATIONAL NOTICE							1JAN85 -30JUN85	20	86HSE/291/4366
TERMINATION REPORT				0			1JAN85 -30JUN85	4	85FEC/390/2428
							1JUL85 -12NOV85	4	85HSE/291/4388
TERMINATED								48	TOTAL PAGES
								48	AUTH TOT PAGE

ATTACHMENT 1 (Page 1 of 2)

FEDERAL ELECTION COMMISSION
1985-1986
CANDIDATE INDEX OF SUPPORTING DOCUMENTS 7- (2) 3

DATE 16JUN86

PAGE 2

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			

4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES

ALL REPORTS HAVE BEEN REVIEWED.

ENDING CASH-ON-HAND AS OF 4/13/86: -(\$3,313)

OUTSTANDING DEBTS AND OBLIGATIONS AS OF 4/13/86: \$126,679

SCHEDULE A

**1985 YEAR-END REPORT
ITEMIZED RECEIPTS**

ATTACHMENT 2
(Use separate schedule for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Friends of Jeff Wentworth

A. Full Name, Mailing Address and ZIP Code Ms. Nancy Jean Raba 198 Oakwell Farms 83008 San Antonio, Texas 78216 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Self-Employed Occupation Real Estate Agent Aggregate Year-to-Date \$1,000.00	Date (month, day, year) 12/19/85	Amount of Each Receipt This Period \$ 1,000.00
B. Full Name, Mailing Address and ZIP Code Mrs. Carl F. Raba, Jr. 10526 Gulfdale San Antonio, Texas 78216 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Raba-Kistner Consultants Occupation Executive Aggregate Year-to-Date \$1,000.00	Date (month, day, year) 08/22/85	Amount of Each Receipt This Period \$ 1,000.00
C. Full Name, Mailing Address and ZIP Code Carl F. Raba, Jr. 10526 Gulfdale San Antonio, Texas 78216 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Raba-Kistner Consultants Occupation Engineer Aggregate Year-to-Date \$1,000.00	Date (month, day, year) 08/22/85	Amount of Each Receipt This Period \$ 1,000.00
D. Full Name, Mailing Address and ZIP Code L. S. Reed Route 3, Box 3309 Boerne, Texas 78006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Requested Occupation Requested Aggregate Year-to-Date \$ 300.00	Date (month, day, year) 07/11/85	Amount of Each Receipt This Period \$ 300.00
E. Full Name, Mailing Address and ZIP Code Joel V. Reitzer, Jr. 118 Algerita San Antonio, Texas 78230 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Joel Reitzer & Associates Occupation Architect Aggregate Year-to-Date \$ 500.00	Date (month, day, year) 07/11/85	Amount of Each Receipt This Period \$ 500.00
F. Full Name, Mailing Address and ZIP Code Joseph Satel 111 Canterbury Hill San Antonio, Texas 78209 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Satel's Occupation Retailer Aggregate Year-to-Date \$ 250.00	Date (month, day, year) 07/29/85	Amount of Each Receipt This Period \$ 250.00
G. Full Name, Mailing Address and ZIP Code Mrs. Cecil C. Scanlan 915 Alamo National Building San Antonio, Texas 78205 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation Homemaker Aggregate Year-to-Date \$1,000.00	Date (month, day, year) 12/01/85	Amount of Each Receipt This Period \$ 1,000.00

GUSTOTAL of Receipts This Page (optional)

TOTAL of Receipts This Page (optional)

SCHEDULE C
(Revised 3/80)

LOAN:

U.S. Department of Housing and Urban Development
Form HUD-900 (Rev. 1-80)

Name of Committee (in full) Friends of Jeff Wentworth			
A. Full Name, Mailing Address and ZIP Code of Loan Source Commercial National Bank 9100 San Pedro San Antonio, Texas 78216		Original Amount of Loan \$25,000.00	Cumulative Payments To Date -
		Balance Outstanding at Close of This Period \$25,000.00	
Election ☒ Primary ☐ General ☐ Other (specify):			
Terms Date Incurred 12-31-85 Date Due 3-3-86 Interest Rate 12 (Specify) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source Carl F. Raba, Jr. 12821 W. Golden Lane San Antonio, Texas 78249		Original Amount of Loan \$5,000.00	Cumulative Payments To Date -
		3,000.00	Balance Outstanding at Close of This Period \$ 5,000.00
			3,000.00
Election ☒ Primary ☐ General ☐ Other (specify):			
Terms Date Incurred 9-10-85 Date Due Demand Interest Rate 12 (Specify) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
SUBTOTALS This Period This Page (optional)		\$33,000.00	
TOTALS This Period (Run page to this line only)		\$33,000.00	

Carry outstanding balance only to LINE 2, Schedule D, for this line. If on Schedule D, carry forward to appropriate line of Summary.

JEFF
WENTWORTH
CHARTER

February 11, 1986

115053

Clerk of the House
U.S. House of Representatives
1036 Longworth House Office Building
Washington, D.C. 20515

★Dear Sir:

Re: C00196733
January 31 Year End Report
Schedule C
Line Number 13(b), Page 1

We have discovered that the loans listed in Item B
from Carl F. Raba, Jr., are not allowed under federal
election campaign laws.

Immediate steps were taken, and those loans have been
repaid in full with interest.

Sincerely,

James E. McCann, Jr.
James E. McCann, Jr.
Treasurer

CERTIFIED MAIL NO. P 594 282 013
RETURN RECEIPT REQUESTED



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ATTACHMENT 5
(1 of 2)

RQ-2

MAR 18 1986

James E. McCann Jr., Treasurer
Friends of Jeff Wentworth
P.O. Box 32948
San Antonio, TX 78216

Identification Number: C00196733

Reference: Year End Report (5/1/85-12/31/85)

Dear Mr. McCann:

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 report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. The Committee for Common Sense appears to be unregistered with the Commission. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §§441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contributions in question were incompletely or incorrectly reported, you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

The Commission notes your intention to repay the \$8,000 loan to Carl F. Raba, Jr. Although the Commission may take further legal steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

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27040541032

-Please clarify if there are any endorser for the \$25,000 loan owed to Commercial National Bank disclosed on Schedule C.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Linda Tangney

Linda Tangney
Reports Analyst
Reports Analysis Division

8603462133



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

RQ-3

April 10, 1986

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth
P.O. Box 32948
San Antonio, TX 78216

Identification Number: C00196733

Reference: Year-End Report (5/1/85-12/31/85)

Dear Mr. McCann:

This letter is to inform you that as of April 9, 1986, the Commission has not received your response to our request for additional information, dated March 18, 1986. 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 Linda Tangney on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

FBI/US 146 UC 46 2 8

MEMORANDUM FOR FILES: TELECON

SUBJECT: 1985 YEAR-END REPORT

FROM: JAMES MCCANN, JR.

TO: LINDA TANGNEY

NAME OF COMMITTEE: FRIENDS OF JEFF WENTWORTH TX

DATE: APRIL 8, 1986

8 7 0 4 0 5 4 4 0 3 5

Mr. McCann telephoned to state that he had received a letter from the Commission regarding the Committee's 1985 Year-End report, and the excessive contributions disclosed in the report. Mr. McCann stated that he had not known that the loans received from Carl F. Raba, Jr. were considered as contributions. Mr. McCann stated that as soon as he was informed that the loans were considered to be excessive contributions, he took immediate steps to repay the loan in full, including interest. Mr. McCann stated that the loan repayments were made on February 7, 1986, and this transaction would be disclosed in the 1986 April Quarterly report.

APP 91

Lancer Corporation
 San Antonio, Texas 78210
 Telephone 214 3071

11555

APR 24 4 8: 35

Federal Election Commission
 Attention Linda Tangney
 Washington D.C. 20543

Dear Mr. Tangney

Enclosed are amendments for the following
 reports for the Friends of Jeff C. McIntosh
 Committee:

January 31 Year End Report
 April 15 Quarterly Report

The amendments reflect the problem noted
 in your latest correspondence to me dated
 April 16, 1986. Specifically, these problems
 and the action taken are as follows:

- (1) The \$8,000 reported as loans from Mc
 Carl Labe have now been reflected
 as contributions. The repayment have
 been reflected as refunds of contributions.
 As discussed, this was an oversight
 on our part, not realizing loans from
 individuals were defined as contributions.
 These were paid back as soon as we
 became aware of the problem.

Lancer Corporation
 250 West Turbo
 San Antonio, Texas 78218
 Telephone (512) 344 3071

(12) The excess contribution of \$1,000 made by the Committee for Common Sense was reported as being an outstanding debt for those periods. Our investigation confirmed your statement that the committee was not a multiple candidate committee and therefore limited to \$1,000 an election.

If there are any questions concerning these matters, please do not hesitate to call me at 512-344-3071.

Sincerely

James S. McLaughlin
 Treasurer
 of Jeff Wentworth

9724030451M93277

LANCER

SCHEDULE A

ITEMIZED RECEIPTS

AMENDED 1985 YEAR-END REPORT

ATTACHMENT 9

Page 13 of 20 for
 LINE NUMBER 11 (a)
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)

Friends of Jeff Wentworth

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Ms. Nancy Jean Raba 198 Oakwell Farms #3008 San Antonio, Texas 78216	Self-Employed	12/19/85	\$ 1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Real Estate Agent		
	Aggregate Year-to-Date-\$ 1,000.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mrs. Carl F. Raba, Jr. 10526 Gulfdale San Antonio, Texas 78216	Raba-Kistner Consultants	08/22/85	\$ 1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Executive		
	Aggregate Year-to-Date-\$ 1,000.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Carl F. Raba, Jr. 10526 Gulfdale San Antonio, Texas 78216	Raba-Kistner Consultants	08/22/85	\$ 1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Engineer	09/10/85	(a) 5,000.00
		09/10/85	(a) 3,000.00
	Aggregate Year-to-Date-\$ 9,000.00 (a) to be refunded		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
L. S. Reed Route 3, Box 3309 Boerne, Texas 78006	Requested	10/11/85	\$ 300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Requested		
	Aggregate Year-to-Date-\$ 300.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Joel V. Reitzer, Jr. 118 Algerita San Antonio, Texas 78230	Joel Reitzer & Associates	10/11/85	\$ 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Architect		
	Aggregate Year-to-Date-\$ 500.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Joseph Satel 111 Canterbury Hill San Antonio, Texas 78209	Satel's	10/29/85	\$ 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Retailer		
	Aggregate Year-to-Date-\$ 250.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mrs. Cecil C. Scanlan 915 Alamo National Building San Antonio, Texas 78205	N/A	12/01/85	\$ 1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Homemaker		
	Aggregate Year-to-Date-\$ 1,000.00		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

DEBTS AND OBLIGATIONS

Including Loans

Friends of Jeff Wentworth		Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor: LDS, Inc. 310 Broadway San Antonio, Texas 78205		0.00	297.61	--	\$ 297.61
Nature of Debt (Purpose): Long distance telephone service					
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor: Milam Photocopy Company Suite A, Milam Building 115 E. Travis Street San Antonio, Texas 78205		0.00	217.53	--	\$ 217.53
Nature of Debt (Purpose): Stationery					
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor: Committee for Common Sense P. O. Box 17770 San Antonio, Texas 78217		0.00	1,000.00	--	1,000.00
Nature of Debt (Purpose): Refund of excess contribution					
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor: Carl Rabe 12821 W. Golden Lane San Antonio, Texas 78249		0.00	8,000.00	--	8,000.00
Nature of Debt (Purpose): Refund of excess contribution					
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor:					
Nature of Debt (Purpose):					
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor:					
Nature of Debt (Purpose):					
17 SUBTOTALS This Period This Page (Include all)					\$ 9,515.14
18 TOTAL This Period (See page this line only)					9,515.14
19 TOTAL OUTSTANDING LOANS from Schedule C (See page only)					25,000.00
20 ADD 17 and 18 and carry forward to appropriate line of Summary Page (See page only)					\$4,515.14

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

ATTACHMENT 11

1986 A L QUARTERLY REPORT

Name of Committee (in Full)

Friends of Jeff Wentworth

Report Covering the Period:

From: **1-1-86**

To: **3-31-86**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

- (a) Individuals/Persons Other Than Political Committees
(Memo Entry Unitemized \$ **17,585.50**)
- (b) Political Party Committees.
- (c) Other Political Committees
(d) The Candidate.
- (e) **TOTAL CONTRIBUTIONS** (other than loans (add 11(a), 11(b), 11(c) and 11(d)).

COLUMN A
Total This Period

COLUMN B
Calendar Year to-Date

77,810.50 **174,927.70**

- -

1,000.00 **10,050.00**

- **2,250.00**

78,810.50 **187,227.70**

11 (a)

11 (b)

11 (c)

11 (d)

11 (e)

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.

- -

12

13. LOANS:

- (a) Made or Guaranteed by the Candidate
(b) All Other Loans
(c) **TOTAL LOANS** (add 13 (a) and 13 (b)).

75,000.00 **100,000.00**

- - *

75,000.00 **100,000.00**

13 (a)

13 (b)

13 (c)

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

131.09 **627.39**

14

15. OTHER RECEIPTS (Dividends, Interest, etc.)

- **13.20**

15

16. TOTAL RECEIPTS (add 11 (a), 12, 13 (c), 14 and 15)

153,941.59 **287,868.29**

16

II. DISBURSEMENTS

17. OPERATING EXPENDITURES 17

117,062.01 **246,041.62**

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES 18

- -

19. LOAN REPAYMENTS:

- (a) Of Loans Made or Guaranteed by the Candidate
(b) Of All Other Loans
(c) **TOTAL LOAN REPAYMENTS** (add 19 (a) and 19 (b)).

25,000.00 **25,000.00**

- -

25,000.00 **25,000.00**

19 (a)

19 (b)

19 (c)

20. REFUNDS OF CONTRIBUTIONS TO:

- (a) Individuals/Persons Other Than Political Committees
(b) Political Party Committees.
(c) Other Political Committees
(d) **TOTAL CONTRIBUTION REFUNDS** (add 20 (a), 20 (b), and 20 (c))

16,000.00 **16,000.00**

- -

- -

16,000.00 **16,000.00**

20 (a)

20 (b)

20 (c)

20 (d)

21. OTHER DISBURSEMENTS. 21

- -

22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)

158,062.01 **287,041.62**

22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD \$ 4,947.09 23

24. TOTAL RECEIPTS THIS PERIOD (From Line 16) \$ 153,941.59 24

25. SUBTOTAL (Add Line 23 and Line 24) \$ 158,888.68 25

26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) \$ 158,062.01 26

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) \$ 826.67 27

SCHEDULE B

ITEMIZED DISBURSEMENTS

1986 APRIL QUARTERLY REPORT

ATTACHMENT 12

Page 1 of 1 for
 LINE NUMBER 20a
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)

Friends of Jeff Wentworth

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Carl Raba, Jr. 12821 Golden Lane San Antonio, Texas 78249	Refund - contribution		
	Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	2-7-86 2-7-86	5,000.00 3,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
LCN Transportation San Antonio, Texas	Refund - Contribution		
	Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	2-26-86	8,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			16,000.00

1986 APRIL QUARTERLY REPORT

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code
Mr. and Mrs. Wallace Roldt
17205 Jones Maltsberger
San Antonio, TX 78247

Purpose of Disbursement
 Fund and Revenue
 For Meeting _____
 Disbursement for Ordinary Expenses
 11 Other (specify) _____

Date (month,
day, year)
11/30/86

Amount of Each Disbursement This Period
\$ 2,000.00
(In Kind)

B. Full Name, Mailing Address and ZIP Code

John Emerson
5927 Lake Bank
San Antonio, TX 78222

Purpose of Disbursement
 Pilot Services
 Disbursement for: ☒ Ordinary ☐ General
☐ Other (specify)

Date (month,
day, year)
03/20/86

Amount of Each Disbursement This Period
\$ 500.00
(In Kind)

C. Full Name, Mailing Address and ZIP Code
C. S. Conrad
3113 Oak Mountain Trail
San Angelo, TX 76904

Purpose of Disbursement
Food for Meeting

Disbursement for: ☒ Primary ☐ General
☐ Other (specify):

Date (month,
day, year)
03/26/86

Amount of Each Disbursement This Period
\$ 250.00 (In Kind)

D. Full Name, Mailing Address and ZIP Code
San Antonio Aviation
San Antonio, Texas

Purpose of Disbursement
Airplane travel

Disbursement for: ☒ Primary ☐ General
☐ Other (Specify):

Date (month,
day, year)
3/24/86
3/26/86

Amount of Each Disbursement: This Period
187.20
158.10

E. Full Name, Mailing Address and ZIP Code

Commercial National Bank
9100 San Pedro
San Antonio, Texas 78216

Purpose of Disbursement
Interest

Disbursement for: ☒ Primary ☐ General
☐ Other (specify):

Date (month,
day, year)
2/25/86

Amount of Each Disbursement This Period	443.83
---	--------

Carl Raba
12821 Golden Lane
San Antonio, Texas

Purpose of Disbursement
Interest

Disbursement for: ☒ Primary ☐ General
☐ Other (specify):

Date (month,
day, year)
2/7/86
2/7/86

Amount of Each Disbursement This Period
250.50
45.00

G. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

Date (month,
day, year)

Amount of Each
Disbursement This Period

M. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

Date (month,
day, year)

Amount of Each Disbursement This Period

1. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General
☐ Other (specify):

Date (month,
day, year)

[illegible]**SUBTOTAL of Disbursements This Page (optional)****TOTAL This Period (Start above this line number only)**

\$ ~~107~~,938.27.

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

STAFF MEMBER & TEL. NO.
Charles Snyder (202) 376-8200

RESPONDENT: Friends of Jeff Wentworth Committee and James E.
McCann, Jr., as treasurer

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that the Friends of Jeff Wentworth Committee ("FJW") and its treasurer accepted an excessive contribution from Carl F. Raba, Jr.

According to RAD, FJW, the principal authorized campaign committee of Jeff Wentworth during his campaign for the Republican nomination for Congress from the 21st district of Texas, accepted the following contributions from Mr. Raba:

1. a \$1,000 contribution, received August 22, 1985;
2. a \$5,000 loan, received September 10, 1985; and
3. a \$3,000 loan, received December 24, 1985.

Both loans were designated for the primary election. Thus it is alleged that Mr. Raba made, and FJW accepted, an excessive contribution of \$8,000.

FACTUAL AND LEGAL ANALYSIS

Under the Federal Election Commission Campaign Act ("the Act")

(a)(1) No person shall make contributions - (A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000....

3704043

(f) No candidate or political committee shall knowingly accept any contribution ... in violation of the provisions of this section.

2 U.S.C. § 441a. The Act defines the term "contribution" to include:

(i) any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office..

2 U.S.C. § 431(8) (A) (emphasis added).

Since Mr. Raba loaned FJW \$8,000 in addition to giving the committee the maximum individual contribution of \$1,000, it appears that FJW violated 2 U.S.C. § 441a(f) by accepting this \$8,000 excessive contribution.

970440541044

Attachment 2
(part 2)

**FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR NO.

STAFF MEMBER & TEL. NO.
Charles Snyder (202) 376-8200

RESPONDENT: Carl F. Raba, Jr.

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that the Friends of Jeff Wentworth Committee ("FJW") and its treasurer accepted an excessive contribution from Carl F. Raba, Jr.

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3. a \$3,000 loan, received December 24, 1985.

Both loans were designated for the primary election. Thus it is alleged that Mr. Raba made, and FJW accepted, an excessive contribution of \$8,000.

FACTUAL AND LEGAL ANALYSIS

Under the Federal Election Campaign Act ("the Act")

(a)(1) No person shall make contributions - (A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000....

97040544045

2 U.S.C. § 441a. The Act defines the term "contribution" to include:

(i) any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office..

2 U.S.C. § 431(8)(A) (emphasis added).

Since Mr. Raba lent FJW \$8,000 in addition to giving the committee the maximum individual contribution of \$1,000, it appears that Mr. Raba made an excessive contribution of \$8,000 in violation of 2 U.S.C. § 441a(a)(1).

97040044040

Attachment 3
(part 1)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth Committee
P.O. Box 32948
San Antonio, Texas 78216

RE: MUR
Friends of Jeff Wentworth and
James E. McCann, Jr., as
treasurer

Dear Mr. McCann:

On , 198 , the Federal Election Commission determined that there is reason to believe Friends of Jeff Wentworth Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you 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. Statements should be submitted under oath.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so

9704047

that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosures

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

cc: Jeff Wentworth

97040044013

attachment 3
(part 2)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Carl F. Raba, Jr.
12821 Golden Lane
San Antonio, Texas 78249

RE: MUR
Carl F. Raba, Jr.

Dear Mr. Raba:

On , 198 , the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

97040544049

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosures

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

87047544050



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

18 June 1986

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 THE FRIENDS OF JEFF WENTWORTH
COMMITTEE

This is a referral of the Friends of Jeff Wentworth Committee (the "Committee"). The Committee accepted a total of \$8,000 in excessive contributions in the form of loans from an individual. According to the 1985-1986 RAD Review and Referral Procedures for Authorized Committees (Standard 2), this matter requires further examination by your office.

The candidate, Jeff Wentworth, lost the primary election held on May 3, 1986 in the twenty-first (21st) congressional district of Texas, receiving twenty percent (20%) of the vote.

If you have any questions, please contact Linda Tangney at 376-2480.

Attachment

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 18 June 1986

ANALYST: Linda Tangney

I. COMMITTEE: Friends of Jeff Wentworth Committee
(C00196733)
James E. McCann Jr., Treasurer
P.O. Box 32948
San Antonio, TX 78216

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Acceptance of Excessive Contributions in the Form of Loans

The Friends of Jeff Wentworth Committee (the "Committee") disclosed on its 1985 Year End Report the receipt of a contribution and loans totalling \$9,000 from an individual, Carl F. Raba, Jr. Schedule A of the Committee's report disclosed a \$1,000 contribution from Carl F. Raba, Jr., received on August 22, 1985, with an aggregate year-to-date total of \$1,000, and designated for the primary election (Attachment 2). Schedule C of the Committee's report disclosed a \$5,000 loan incurred on September 10, 1985, and a \$3,000 loan incurred on December 24, 1985, for a total of \$8,000 in loans received from Carl F. Raba, Jr. Both loans were designated for the primary election, had a due date of "demand," and an interest rate of twelve percent (12%) (Attachment 3). The amount of the apparent excessive contribution received from Carl F. Raba, Jr., totalled \$8,000.

On February 11, 1986, the Committee filed an amendment to its 1985 Year End Report. The amendment noted that the loans from Carl F. Raba, Jr. were not allowable ". . . under federal election campaign laws." The Committee also noted in its amendment, that the loans had been repaid in full, including interest (Attachment 4).

On March 18, 1986, a Request for Additional Information ("RFAI") was mailed to the Committee regarding its 1985 Year End Report. The RFAI informed the Committee of the apparent excessive contributions, and noted its intentions to repay the loans (Attachment 5). No written responses were received, and on April 10, 1986, a Second Notice was mailed to the Committee (Attachment 6).

87040541052

FRIENDS OF JEFF WENTWORTH COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On April 8, 1986, the treasurer, James McCann, Jr., telephoned to explain that the Committee had repaid the loans in full to Mr. Carl F. Raba, Jr. on February 7, 1986. Mr. McCann stated that he had not known that the loans were actually excessive contributions, and that when he was informed that they were excessive, he immediately took steps to repay the loans. Mr. McCann stated that the loan repayments would appear in the 1986 April Quarterly Report (Attachment 7).

On April 24, 1986, the Committee filed an amendment to its 1985 Year End Report, and filed its 1986 April Quarterly Report. The amended 1985 Year End Report noted in a cover letter that the loans received from Carl F. Raba, Jr., were now reflected as contributions, and that the repayments would be reflected as contribution refunds (Attachment 8). Schedule A, disclosed contributions of \$1,000 received on August 22, 1985, and \$5,000 and \$3,000 received on September 10, 1985, for a total amount of \$9,000 received from Carl F. Raba, Jr. The aggregate year-to-date total was listed as \$9,000 and the contributions were attributed to the primary election (Attachment 9). The amended 1985 Year End Report also included an amended Schedule D to show an \$8,000 debt owed to Mr. Raba and the loans were deleted from Schedule C (Attachment 10).

The Committee's 1986 April Quarterly Report disclosed the \$8,000 contribution refunds in the total disclosed on Line 20(a) of the Detailed Summary Page (Attachment 11). Schedule B, supporting Line 20(a) disclosed contribution refunds of \$5,000 and \$3,000 both made on February 7, 1986 for a total of \$8,000 in contribution refunds to Carl F. Raba, Jr. (Attachment 12). Also, on Schedule B, supporting Line 17 of the Detailed Summary Page, amounts of \$250.50 and \$45, for a total of \$295.50, were disclosed as interest payments to Carl F. Raba, Jr. made on February 7, 1986 (Attachment 13).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

DATE 16JUN86

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			

WENTWORTH, JEFF		HOUSE 21 REPUBLICAN PARTY			TEXAS		1986 ELECTION	ID# H2TX33025	
1. STATEMENT OF CANDIDATE									
1985 STATEMENT OF CANDIDATE							17JUL85	1	85HSE/287/3731
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
FRIENDS OF JEFF WENTWORTH							ID# C00196733	HOUSE	
1985 STATEMENT OF ORGANIZATION							17JUL85	1	85HSE/287/3728
YEAR-END			133,926		128,979	1MAY85 -31DEC85	40	86HSE/294/5020	
YEAR-END - AMENDMENT			-		-	1MAY85 -31DEC85	1	86HSE/297/3385	
YEAR-END - AMENDMENT			-		-	1MAY85 -31DEC85	2	86HSE/303/0926	
YEAR-END - AMENDMENT			133,926		128,979	1MAY85 -31DEC85	38	86HSE/303/0928	
REQUEST FOR ADDITIONAL INFORMATION							1MAY85 -31DEC85	6	86FEC/405/1357
REQUEST FOR ADDITIONAL INFORMATION 2ND							1MAY85 -31DEC85	7	86FEC/408/1511
1986 48 HOUR CONTRIBUTION NOTICE							19APR86	1	86HSE/302/1558
48 HOUR CONTRIBUTION NOTICE							21APR86	1	86HSE/302/4734
48 HOUR CONTRIBUTION NOTICE							24APR86	1	86HSE/303/1131
48 HOUR CONTRIBUTION NOTICE							28APR86	1	86HSE/303/1650
48 HOUR CONTRIBUTION NOTICE							29APR86	1	86HSE/305/2092
48 HOUR CONTRIBUTION NOTICE							1MAY86	1	86HSE/305/2091
48 HOUR CONTRIBUTION NOTICE							2MAY86	1	86HSE/303/2721
48 HOUR CONTRIBUTION NOTICE							6MAY86	1	86HSE/303/3230
APRIL QUARTERLY			153,941		158,062	1JAN86 -31MAR86	30	86HSE/302/0223	
APRIL QUARTERLY - AMENDMENT			153,941		158,062	1JAN86 -31MAR86	30	86HSE/303/0966	
APRIL QUARTERLY - AMENDMENT			-		-	1JAN86 -31MAR86	1	86FEC/412/5300	
APRIL QUARTERLY - AMENDMENT			-		-	1JAN86 -31MAR86	3	86HSE/304/2592	
APRIL QUARTERLY - AMENDMENT			153,941		158,062	1JAN86 -31MAR86	32	86HSE/305/2238	
REQUEST FOR ADDITIONAL INFORMATION							1JAN86 -31MAR86	2	86FEC/413/5054
REQUEST FOR ADDITIONAL INFORMATION 2ND							1JAN86 -31MAR86	3	86FEC/416/1602
PRE-PRIMARY			35,921		40,060	1APR86 -13APR86	14	86HSE/303/0450	
PRE-PRIMARY - AMENDMENT			35,921		40,060	1APR86 -13APR86	16	86HSE/305/2276	
NOTICE OF FAILURE TO FILE							1APR86 -13APR86	1	86FEC/412/1076
REQUEST FOR ADDITIONAL INFORMATION							1APR86 -13APR86	2	86FEC/416/0100
TOTAL			323,788	0	327,101	0	237	TOTAL PAGES	
4. AUTHORIZED COMMITTEES									
JEFF WENTWORTH FOR CONGRESS COMMITTEE							ID# C00152330	HOUSE	
1985 MISCELLANEOUS REPORT							6DEC85 FROM FEC	1	85FEC/392/1428
MID-YEAR REPORT				38,818	32,888	1JAN85 -30JUN85	19	85HSE/290/2601	
MID-YEAR REPORT - AMENDMENT				38,818	32,888	1JAN85 -30JUN85	20	85HSE/291/4366	
1ST LETTER INFORMATIONAL NOTICE							1JAN85 -30JUN85	4	85FEC/390/2428
TERMINATION REPORT							1JUL85 -12NOV85	4	85HSE/291/4389
TERMINATED								48	TOTAL PAGES
								48	AUTH TOT PAGES

FEDERAL ELECTION COMMISSION

DATE 16JUN86

1985-1986
CANDIDATE INDEX OF SUPPORTING DOCUMENTS (B)

PAGE 2

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			

TYPE OF FILER

4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES

ALL REPORTS HAVE BEEN REVIEWED.

ENDING CASH-ON-HAND AS OF 4/13/86: -(\$3,313)

OUTSTANDING DEBTS AND OBLIGATIONS AS OF 4/13/86: \$126,679

SCHEDULE A

**1985 YEAR-END REPORT
ITEMIZED RECEIPTS**

ATTACHMENT 2
(Use separate schedule for each category of the Detailed Summary Page)

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

Name of Committee (in full)
Friends of Jeff Winkworth

A. Full Name, Mailing Address and ZIP Code Ms. Nancy Jean Raba 198 Oakwell Farms 83008 San Antonio, Texas 78216 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Self-Employed Occupation Real Estate Agent Aggregate Year-to-Date - \$1,000.00	Date (month, day, year) 12/19/85	Amount of Each Receipt This Period \$ 1,000.00
B. Full Name, Mailing Address and ZIP Code Mrs. Carl F. Raba, Jr. 10526 Gulfdale San Antonio, Texas 78216 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Raba-Kistner Consultants Occupation Executive Aggregate Year-to-Date - \$1,000.00	Date (month, day, year) 08/22/85	Amount of Each Receipt This Period \$ 1,000.00
C. Full Name, Mailing Address and ZIP Code Carl F. Raba, Jr. 10526 Gulfdale San Antonio, Texas 78216 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Raba-Kistner Consultants Occupation Engineer Aggregate Year-to-Date - \$1,000.00	Date (month, day, year) 08/22/85	Amount of Each Receipt This Period \$ 1,000.00
D. Full Name, Mailing Address and ZIP Code L. S. Reed Route 3, Box 3309 Boerne, Texas 78006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Requested Occupation Requested Aggregate Year-to-Date - \$ 300.00	Date (month, day, year) 10/11/85	Amount of Each Receipt This Period \$ 300.00
E. Full Name, Mailing Address and ZIP Code Joel V. Reitzer, Jr. 118 Algerita San Antonio, Texas 78230 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Joel Reitzer & Associates Occupation Architect Aggregate Year-to-Date - \$ 500.00	Date (month, day, year) 10/11/85	Amount of Each Receipt This Period \$ 500.00
F. Full Name, Mailing Address and ZIP Code Joseph Satel 111 Canterbury Hill San Antonio, Texas 78209 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Satel's Occupation Retailer Aggregate Year-to-Date - \$ 250.00	Date (month, day, year) 10/29/85	Amount of Each Receipt This Period \$ 250.00
G. Full Name, Mailing Address and ZIP Code Mrs. Cecil C. Scanlan 915 Alamo National Building San Antonio, Texas 78205 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation Homemaker Aggregate Year-to-Date - \$1,000.00	Date (month, day, year) 12/01/85	Amount of Each Receipt This Period \$ 1,000.00
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

836031403143333

SCHEDULE C
(Revised 3/80)

LOAN

Use this space for each numbered line

Name of Committee (in Full) Friends of Jeff Wentworth		Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
A. Full Name, Mailing Address and ZIP Code of Loan Source Commercial National Bank 9100 San Pedro San Antonio, Texas 78216		\$25,000.00	-	\$25,000.00
Election ☒ Primary ☐ General ☐ Other (specify):		Interest Rate 12 % (per)		
Terms Date Incurred 12-31-85 Date Due 3-3-86		☐ Secured		
List All Endorsers or Guarantors (if any) to item A				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
B. Full Name, Mailing Address and ZIP Code of Loan Source Carl F. Raba, Jr. 12821 W. Golden Lane San Antonio, Texas 78249		Original Amount of Loan \$5,000.00 3,000.00	Cumulative Payments To Date -	Balance Outstanding at Close of This Period \$ 5,000.00 3,000.00
Election ☒ Primary ☐ General ☐ Other (specify):		Interest Rate 12 % (per)		
Terms Date Incurred 9-10-85 Date Due Demand		☐ Secured		
List All Endorsers or Guarantors (if any) to item B				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
SUBTOTALS This Period This Page (optional)			\$33,000.00	
TOTALS This Period (Run page in this line only)			\$33,000.00	
Carry outstanding balance only to LINE 2, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.				

JEFF
WENTWORTH
CHARTER

February 11, 1986

115053

Clerk of the House
U.S. House of Representatives
1036 Longworth House Office Building
Washington, D.C. 20515

★Dear Sir:

Re: C00196733
January 31 Year End Report
Schedule C
Line Number 13(b), Page 1

We have discovered that the loans listed in Item B
from Carl F. Raba, Jr., are not allowed under federal
election campaign laws.

Immediate steps were taken, and those loans have been
repaid in full with interest.

Sincerely,

James E. McCann, Jr.
James E. McCann, Jr.
Treasurer

CERTIFIED MAIL NO. P 594 282 013
RETURN RECEIPT REQUESTED



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ATTACHMENT 5
(1 of 2)

RQ-2

MAR 18 1996

James E. McCann Jr., Treasurer
Friends of Jeff Wentworth
P.O. Box 32948
San Antonio, TX 78216

Identification Number: C00196733

Reference: Year End Report (5/1/85-12/31/85)

Dear Mr. McCann:

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 report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. The Committee for Common Sense appears to be unregistered with the Commission. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §§441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contributions in question were incompletely or incorrectly reported, you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

The Commission notes your intention to repay the \$8,000 loan to Carl F. Raba, Jr. Although the Commission may take further legal steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

86034051357
9774754979

-Please clarify if there are any endorser for the \$25,000 loan owed to Commercial National Bank disclosed on Schedule C.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Linda Tangney

Linda Tangney
Reports Analyst
Reports Analysis Division

860340:143500



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20543

BO-3

April 10, 1986

James E. McCann, Jr., Treasurer
Friends of Jeff Wentworth
P.O. Box 32948
San Antonio, TX 78216

Identification Number: C00196733

Reference: Year-End Report (5/1/85-12/31/85)

Dear Mr. McCann:

This letter is to inform you that as of April 9, 1986, the Commission has not received your response to our request for additional information, dated March 18, 1986. 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 Linda Tangney on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

37604340-71311

MEMORANDUM FOR FILES: TELECON

SUBJECT: 1985 YEAR-END REPORT

FROM: JAMES MCCANN, JR.

TO: LINDA TANGNEY

NAME OF COMMITTEE: FRIENDS OF JEFF WENTWORTH TX

DATE: APRIL 8, 1986

37740541052

Mr. McCann telephoned to state that he had received a letter from the Commission regarding the Committee's 1985 Year-End report, and the excessive contributions disclosed in the report. Mr. McCann stated that he had not known that the loans received from Carl F. Raba, Jr. were considered as contributions. Mr. McCann stated that as soon as he was informed that the loans were considered to be excessive contributions, he took immediate steps to repay the loan in full, including interest. Mr. McCann stated that the loan repayments were made on February 7, 1986, and this transaction would be disclosed in the 1986 April Quarterly report.

APP 911

Lancer Corporation
 1101 N. Loop West
 San Antonio, Texas 78216
 Telephone 214 344 3071

11500

APR 24 4 48:35

Federal Election Commission
 Attention Linda Tanguay
 Washington D.C. 20543

Dear Mr. Tanguay

RECEIVED
 CIVIL RIGHTS DIVISION
 APR 24 PM 3:50
 U.S. DEPT. OF JUSTICE

Enclosed are amendments for the following
 reports for the Friends of Jeff C. Entwistle
 Committee.

January 31 Year End Report
 April 15 Quarterly Report

The amendments reflect the problems noted
 in your latest correspondence to me dated
 April 16, 1986. Specifically, these problems
 and the action taken are as follows:

- (1) The \$8,000 reported as loans from Mr. Carl Kaba have now been reported as contributions. The repayment have been reflected as refunds of contributions. As discussed, this was an oversight on our part, not realizing loans from individuals were reported as contributions. These were paid back as soon as we became aware of the problem.

Lancer Corporation
 235 West Turbo
 San Antonio, Texas 78216
 Telephone (512) 344 3071

(2) The above contribution of \$1,000 made
 by the Committee for Common Sense
 is now reported as being an substantial
 debt for those periods. Our investigation
 confirmed your statement that the
 committee was not a multiple
 candidate committee and therefore
 limited to \$1,000 an election.

If there are any questions concerning this
 matter, please do not hesitate to call
 me at 512-344-3071.

Sincerely

James S. McLean
 Treasurer
 of Jeff Wentworth

SCHEDULE A

ITEMIZED RECEIPTS

AMENDED 1985 YEAR-END REPORT

ATTACHMENT 9

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

Name of Committee (in Full)

Friends of Jeff Wentworth

A. Full Name, Mailing Address and ZIP Code

Ms. Nancy Jean Raba
 198 Oakwell Farms #3008
 San Antonio, Texas 78216

Name of Employer

Self-Employed

Date (month,
 day, year)

12/19/85

Amount of Each
 Receipt this Period

\$ 1,000.00

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Occupation
 Real Estate Agent

Aggregate Year-to-Date-\$ 1,000.00

B. Full Name, Mailing Address and ZIP Code

Mrs. Carl F. Raba, Jr.
 10526 Gulfdale
 San Antonio, Texas 78216

Name of Employer

Raba-Kistner
 Consultants

Date (month,
 day, year)

08/22/85

Amount of Each
 Receipt This Period

\$ 1,000.00

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Occupation
 Executive

Aggregate Year-to-Date-\$ 1,000.00

C. Full Name, Mailing Address and ZIP Code

Carl F. Raba, Jr.
 10526 Gulfdale
 San Antonio, Texas 78216

Name of Employer

Raba-Kistner
 Consultants

Date (month,
 day, year)

08/22/85

Amount of Each
 Receipt This Period

\$ 1,000.00

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Occupation
 Engineer

Aggregate Year-to-Date-\$ 9,000.00 (a) to be refunded

D. Full Name, Mailing Address and ZIP Code

L. S. Reed
 Route 3, Box 3309
 Boerne, Texas 78006

Name of Employer

Requested

Date (month,
 day, year)

10/11/85

Amount of Each
 Receipt This Period

\$ 300.00

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Occupation
 Requested

Aggregate Year-to-Date-\$ 300.00

E. Full Name, Mailing Address and ZIP Code

Joel V. Reitzer, Jr.
 118 Algerita
 San Antonio, Texas 78230

Name of Employer

Joel Reitzer &
 Associates

Date (month,
 day, year)

10/11/85

Amount of Each
 Receipt This Period

\$ 500.00

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Occupation
 Architect

Aggregate Year-to-Date-\$ 500.00

F. Full Name, Mailing Address and ZIP Code

Joseph Satel
 111 Canterbury Hill
 San Antonio, Texas 78209

Name of Employer

Satel's

Date (month,
 day, year)

10/29/85

Amount of Each
 Receipt This Period

\$ 250.00

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Occupation
 Retailer

Aggregate Year-to-Date-\$ 250.00

G. Full Name, Mailing Address and ZIP Code

Mrs. Cecil C. Scanlan
 915 Alamo National Building
 San Antonio, Texas 78205

Name of Employer

N/A

Date (month,
 day, year)

12/01/85

Amount of Each
 Receipt This Period

\$ 1,000.00

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Occupation
 Homemaker

Aggregate Year-to-Date-\$ 1,000.00

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

3704004

SCHEDULE D
 (Form 280)

DEBTS AND OBLIGATIONS
 Excluding Loans

 For each of 1 year
 ending 10
 (For each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance at Close of This Period
Friends of Jeff Wentworth				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor: LDS, Inc. 310 Broadway San Antonio, Texas 78205	0.00	297.61	--	\$ 297.61
Nature of Debt (Purpose): Long distance telephone service				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor: Milam Photocopy Company Suite A, Milam Building 115 E. Travis Street San Antonio, Texas 78205	0.00	217.53	--	\$ 217.53
Nature of Debt (Purpose): Stationery				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor: Committee for Common Sense P. O. Box 17770 San Antonio, Texas 78217	0.00	1,000.00	--	1,000.00
Nature of Debt (Purpose): Refund of excess contribution				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor: Carl Rabe 12821 W. Golden Lane San Antonio, Texas 78249	0.00	8,000.00	--	8,000.00
Nature of Debt (Purpose): Refund of excess contribution				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				\$ 9,515.14
2) TOTAL This Period (last page this line only)				9,515.14
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				25,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				84,515.14

373473030965

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

ATTACHMENT 11

1986 APRIL QUARTERLY REPORT

Name of Committee (in Full) Friends of Jeff Wentworth		Report Covering the Period From: 1-1-86 To: 3-31-86	
		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees (Memo Entry Unitemized \$ <u>17,585.50</u>)	77,810.50	174,927.70	11 (a)
(b) Political Party Committees	-	-	11 (b)
(c) Other Political Committees	1,000.00	10,050.00	11 (c)
(d) The Candidate	-	2,250.00	11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d)).	78,810.50	187,227.70	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	-	-	12
13. LOANS:			
(a) Made or Guaranteed by the Candidate	75,000.00	100,000.00	13 (a)
(b) All Other Loans	-	- *	13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b)).	75,000.00	100,000.00	13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	131.09	627.39	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	-	13.20	15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	153,941.59	287,868.29	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	117,062.01	246,041.62	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	-	-	18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	25,000.00	25,000.00	19 (a)
(b) Of All Other Loans	-	-	19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b)).	25,000.00	25,000.00	19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	16,000.00	16,000.00	20 (a)
(b) Political Party Committees	-	-	20 (b)
(c) Other Political Committees	-	-	20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))	16,000.00	16,000.00	20 (d)
21. OTHER DISBURSEMENTS	-	-	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	158,062.01	287,041.62	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	<u>4,947.09</u>	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$	<u>153,941.59</u>	24
25. SUBTOTAL (Add Line 23 and Line 24)	\$	<u>158,888.68</u>	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$	<u>158,062.01</u>	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$	<u>826.67</u>	27

SCHEDULE B

ITEMIZED DISBURSEMENTS

1986 APRIL QUARTERLY REPORT

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

Name of Committee (in Full)

Friends of Jeff Wentworth

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Carl Raba, Jr. 12821 Golden Lane San Antonio, Texas 78249	Refund - contribution		
	Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	2-7-86 2-7-86	5,000.00 3,000.00
B. Full Name, Mailing Address and ZIP Code LCN Transportation San Antonio, Texas	Purpose of Disbursement Refund - Contribution	Date (month, day, year) 2-26-86	Amount of Each Disbursement This Period 8,000.00
	Disbursement for: ☒ Primary ☐ General ☐ Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			16,000.00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2224

DATE FILMED 4/2/87 CAMERA NO. 4

CAMERAMAN GPC

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