



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3433

DATE FILMED 3/13/92 CAMERA NO. 13

CAMERAMAN Jim H

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 30 August 1991

ANALYST: ANDREW ZEHE

I. COMMITTEE: Friends of Sam Johnson
(C00250720)
Lyndon Bozeman, Treasurer
P.O. Box 797866
Dallas, TX 75379

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

III. BACKGROUND:

Failure to File Forty-Eight Hour Notifications

The Friends of Sam Johnson committee ("the Committee") has failed to file forty (40) or 100% of the required 48-Hour Notifications for contributions totaling \$43,000 received prior to the 1991 Special Runoff Election.

The candidate was involved in the 1991 Special Runoff Election held on May 18, 1991. Prior Notice was sent to the Committee on April 4, 1991 (Attachment 2). The Notice includes a section titled "Last-Minute Contributions". This section reads "Committees participating in the Special Election and/or the Special Runoff must also file special notices on contributions (including contributions and loans from the candidate) of \$1,000 or more, received between the 20th day and 48 hours before the day of election. (See below.)"

Special Election: 4/15/91 through 5/1/91

Special Runoff: 5/5/91 through 5/15/91.

The notices must reach the appropriate federal and state offices within 48 hours of the committee's receipt."

Schedule A of the 1991 30 Day Post-Runoff Report indicates that the Committee failed to file forty (40) or 100% of the required 48-Hour Notices for contributions received during the aforementioned period (Attachment 3). The following is a list of the contributions for which no 48-Hour Notices were filed:

**FRIENDS OF S. JOHNSON
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Louis A. Beecherl, Jr.	05/09/91	\$1,000
Wendy J. Boothe	05/10/91	\$1,000
William A. Boothe, MD	05/14/91	\$1,000
John Brodhead	05/14/91	\$1,000
Lucile Brodhead	05/14/91	\$1,000
Dr. Jesse M. Brooks	05/07/91	\$1,000
William E. Cooper	05/09/91	\$1,000
Natalie Duncan	05/14/91	\$1,000
Roy Guffey	05/07/91	\$1,000
Mrs. Roy Guffy	05/09/91	\$1,000
Lyda H. Hill	05/14/91	\$1,000
Mrs. H. L. Hunt	05/14/91	\$1,000
Nancy Ann Hunt	05/09/91	\$1,000
Ray L. Hunt	05/10/91	\$1,000
Gordon R. Johnson	05/10/91	\$1,000
Robert E. Johnson, Jr.	05/10/91	\$1,000
H. Ward Lay	05/09/91	\$1,000
M. Thomas Lardner	05/14/91	\$1,000
Charles Henry Lincoln	05/10/91	\$1,000
Thomas J. or Carolyn G. Marquez ^{1/}	05/14/91	\$1,000
William Nathan	05/14/91	\$1,000
William D. Oates	05/09/91	\$1,000
Peter O'Donnell, Jr.	05/15/91	\$1,000
R. H. Pickens	05/08/91	\$1,000
Jas W. Porter	05/14/91	\$1,000
Ralph F. Rashbaum	05/09/91	\$1,000
Bob B. Roberts ^{1/}	05/14/91	\$1,000
Allan N. Shulkin	05/15/91	\$1,000
C. Dan Smith	05/09/91	\$1,000
Merrie Spaeth	05/07/91	\$1,000
Henry Stuart	05/09/91	\$1,000
Marcia Stuart	05/09/91	\$1,000
Charles T. Terrell	05/08/91	\$1,000
A. M. Wiederkehr	05/14/91	\$1,000
Arco PAC	05/14/91	\$1,000
Dealers Election Action Committee	05/14/91	\$1,000
Central Region Dow Chemical Empac	05/14/91	\$1,000
McDonald's PAC	05/07/91	\$1,000
NL Industries, Inc. PAC	05/14/91	\$3,000
Texas Power & Light Empac ^{1/}	05/07/91	\$2,000

^{1/} There are 3 contributor discrepancies between the Committee's 1991 30 Day Post-Runoff Report and the 48-Hour Notices included in the Committee's amended 1991 12 Day Pre-Runoff Report dated July 3, 1991. The contribution from Thomas J. or Carolyn G. Marquez is reported on the 48-Hour Notice as being from Thomas Marquez. The contribution from Bob B. Roberts is reported as being from Caroline Roberts on the 48-Hour Notice. With the contribution from Texas Power and Light Empac, there is a discrepancy in the date it was received by the Committee. The Committee's 30 Day Post-Runoff Report records the date of receipt as May 3, 1991. However, in the 48-Hour Notice, the contribution is recorded as being received on May 7, 1991, which would have required a 48-Hour notification.

On June 13, 1991, a representative of the Committee (Jim Murrell), phoned a Reports Analysis Division analyst (Attachment 4). Mr. Murrell had received a Request for Additional Information ("RFAI") referencing the Committee's 1991 12 Day Pre-Runoff Report. The RFAI notes on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for last minute contributions. Mr. Murrell inquired about the last minute reporting requirements. The analyst told him the dates for which 48-Hour Notices were required. Mr. Murrell stated that the Committee had never received the Prior Notice noting the requirement to file 48-Hour Notices and listing the dates of those notices. The analyst sent Mr. Murrell a copy of the Prior Notice upon his request.

On June 26, 1991, Mr. Leon Bennett phoned the analyst (Attachment 5). The analyst informed Mr. Bennett that the Committee would probably be referred to the Office of General Counsel for failure to file the required 48-Hour Notices. Mr. Bennett stated that the Committee had not received a copy of the Prior Notice noting the reporting requirement until after the election. He added that the Committee would send a letter outlining their policies on 48-Hour Notices and listing the contributions which should have been reported.

On July 3, 1991, the Committee responded by letter (Attachment 6). The letter notes that the failure to file 48-Hour Notices was "wholly inadvertent" and cites a lack of time to organize the campaign along with a diffusion of experienced election support personnel over a large field of candidates as contributing factors. The letter also reiterates the Committee's claim that they did not receive the Prior Notice until after the election. Included with the letter are copies of the 48-Hour Notices which the Committee should have filed and a copy of the Committee's policy on 48-Hour Notices. The letter states that given the above circumstances, the Committee believes that the Commission should terminate its proceedings pursuant to 11 CFR §111.9(b).

On August 2, 1991, an Informational Notice referencing the 1991 30 Day Post-Runoff Report was sent to the Committee (Attachment 7). The notice notes that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The notice requests the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice states that although the Commission may take legal steps, any response would be taken into consideration.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

FEDERAL ELECTION COMMISSION
1991-1992
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 23AUG91
Attachment 1
PAGE 1

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

TYPE OF FILE									

JOHNSON, SAMUEL ROBERT	HOUSE OF REPUBLICAN PARTY				TEXAS		1991 ELECTION	ID# H2TX03118	
1. STATEMENT OF CANDIDATE									
1991 STATEMENT OF CANDIDATE							5MAR91	1	91HSE/426/4328
2. PRINCIPAL CAMPAIGN COMMITTEE									
FRIENDS OF SAM JOHNSON							ID #000250720	HOUSE	
1991 STATEMENT OF ORGANIZATION							28FEB91	1	91HSE/426/4329
PRE-SPECIAL			107,824		62,173	134N91 - 44APR91		106	91HSE/427/2990
PRE-SPECIAL - AMENDMENT			107,824		62,173	134N91 - 44APR91		3	91HSE/428/2737
REQUEST FOR ADDITIONAL INFORMATION						134N91 - 44APR91		2	91FEC/695/3273
PRE-SPECIAL - AMENDMENT			107,824		62,173	134N91 - 14APR91		37	91HSE/428/5246
PRE-RUN-OFF			32,503		63,678	15APR91 - 28APR91		49	91HSE/428/0083
PRE-RUN-OFF - AMENDMENT						15APR91 - 28APR91		2	91HSE/428/3643
PRE-RUN-OFF - AMENDMENT						15APR91 - 28APR91		1	91HSE/428/4663
PRE-RUN-OFF - AMENDMENT			32,503		63,678	15APR91 - 28APR91		45	91HSE/428/5201
NOTICE OF FAILURE TO FILE						15APR91 - 28APR91		1	91FEC/695/0503
REQUEST FOR ADDITIONAL INFORMATION						15APR91 - 28APR91		2	91FEC/697/2747
REQUEST FOR ADDITIONAL INFORMATION AND						15APR91 - 28APR91		1	91FEC/699/3618
1ST LETTER INFORMATIONAL NOTICE						15APR91 - 28APR91		1	91FEC/707/0731
POST-RUN-OFF			178,123		165,805	29APR91 - 7JUN91		72	91HSE/428/4173
POST-RUN-OFF - AMENDMENT			178,123		165,805	29APR91 - 7JUN91		3	91HSE/428/4246
1ST LETTER INFORMATIONAL NOTICE						29APR91 - 7JUN91		1	91FEC/707/0722
MID-YEAR REPORT				21,557	30,330	8JUN91 - 30JUN91		14	91HSE/431/3179
TOTAL			210,625	237,205	229,483	154,676		341	TOTAL PAGES
3. AUTHORIZED COMMITTEES									
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									

All reports have been reviewed except the 1991 Mid-Year Report
Ending cash on hand as of 6/30/91: 18,020.42
Outstanding debts owed by the Committee as of 6/30/91: 73,618.41

REPORT/NOTICE

Attachrent # 2
Page 1 of 2

FEDERAL ELECTION COMMISSION

Texas Special
Congressional Committees

April 4, 1991

I. IF ONLY ONE ELECTION^{1/} IS HELD (5/4):

REPORT	REPORTING PERIOD ^{2/}	REG./CERT.	FILING
		MAILING DATE ^{3/}	DATE
Pre-Special	01/01/91 - 04/14/91	04/19/91	04/22/91
Post-Special	04/15/91 - 05/24/91	06/03/91	06/03/91
Mid-Year	05/25/91 - 06/30/91	07/31/91	07/31/91

II. IF TWO ELECTIONS ARE HELD, AND A COMMITTEE IS INVOLVED IN BOTH; SPECIAL ELECTION (5/4) AND SPECIAL RUNOFF (5/18):

REPORT	REPORTING PERIOD ^{2/}	REG./CERT.	FILING
		MAILING DATE ^{3/}	DATE
Pre-Special	01/01/91 - 04/14/91	04/19/91	04/22/91
Pre-Runoff ^{4/}	04/15/91 - 04/28/91	05/06/91	05/06/91
Post-Runoff ^{5/}	04/29/91 - 06/07/91	06/17/91	06/17/91
Mid-Year	06/08/91 - 06/30/91	07/31/91	07/31/91

III. IF TWO ELECTIONS ARE HELD, BUT A COMMITTEE IS INVOLVED IN ONLY THE FIRST, SPECIAL ELECTION (5/4):

REPORT	REPORTING PERIOD ^{2/}	REG./CERT.	FILING
		MAILING DATE ^{3/}	DATE
Pre-Special	01/01/91 - 04/14/91	04/19/91	04/22/91
Mid-Year	04/15/91 - 06/30/91	07/31/91	07/31/91

WHO MUST FILE

Principal campaign committees of congressional candidates who seek election in the Texas Special Election on May 4, 1991, and, if held, the Special Runoff on May 18, 1991.

- 1/ If no candidate achieves a majority of the votes cast in the Special Election, the two top vote-getters, regardless of party affiliation, will go on to the Special Runoff Election.
- 2/ The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.
- 3/ Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.
- 4/ Committees involved in the Special Runoff Election may use the May 6 filing date as the mailing date for the Pre-Runoff Report.

(over)

**Texas Special
Congressional Committees**

WHAT MUST BE REPORTED

All financial activity that occurred during the reporting period (or before, if not previously reported).

REPORTING FORMS

Candidate committees use Form 3 (enclosed). If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report on Form 32.

WHERE TO FILE

Consult the instructions on the back of the Form 3 Summary Page. Note state filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

LAST-MINUTE CONTRIBUTIONS

Committees participating in the Special Election and/or the Special Runoff must also file special notices on contributions (including contributions and loans from the candidate) of \$1,000 or more, received between the 20th day and 48 hours before the day of the election. (See below.)

Special Election: 4/15/91 through 5/1/91

Special Runoff: 5/5/91 through 5/15/91

The notices must reach the appropriate federal and state offices within 48 hours of the committee's receipt.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

FOR INFORMATION, Call: 800/424-9530 or 202/376-3120

Contributions From Individuals / Persons
Committee Friends of San Joaquin

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE
AMOUNT

Boeshart, Louis A., Jr.
3801 Beverly Drive

Dallas, Tx 75205

Self Employed
Investments-Oil & Gas

Runoff
Year To Date Total 2,000.00 05/07/91 1,000.00

Bennett, S. Leon
13 Manor Ln.

Dallas, Tx 7527-8645

Self Employed
Lawyer

Runoff
Year To Date Total 225.00 05/17/91 225.00

Biggers, John C.
4000 University Blvd.

Dallas, Tx 75205

Special
Year To Date Total 500.00 04/29/91 500.00

Bierner, Harold Mr. or Mrs.
3120 Commonwealth Dr.

Dallas, Tx 75247

Runoff
Year To Date Total 200.00 05/20/91 200.00

PAGE TOTAL 1,925.00

Contributions from Individuals / Persons
Committee Name: Friends of Sam Johnson

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	TYPE	EMPLOYER	OCCUPATION	DATE	AMOUNT
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Billings, Thomas J.
8035 Cape Ann

Corpus Christi, Tx 78412

Runoff							06/09/91	100.00
Year To Date Total						200.00		

Billingsley, Lucy
2100 Stemmons Frey

Dallas, Tx 75207

Runoff							06/28/91	250.00
Year To Date Total						250.00		

Blakeley, Timothy
12847 Burnhaling Ln.

Dallas, Tx 75243

Runoff							05/20/91	350.00
Year To Date Total						350.00		

Boothe, Wendy J.
2713 Winfield

Plano, Tx 75023

Housewife

Runoff							06/10/91	1,000.00
Year To Date Total						1,000.00		

PAGE TOTAL

1,700.00

Contributions From Individuals
Committee Name: Friends of Sam Johnson

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE

EMPLOYER
OCCUPATION

DATE AMOUNT

Boraman, Lyndon T.
P.O. Box 861861

Plano, Tx 75086

Self Employed
Real Estate

Special

Year To Date Total

1,000.00

05/01/91 1,000.00

Boothe, William A., M.D.
P.O. Box 181027

Dallas, Tx 75210

Self Employed
Medical Doctor

Runoff

Year To Date Total

2,000.00

05/14/91 1,000.00

Bredhead, John R., Jr.
P.O. Box 860894

Plano, Tx 75086

Self Employed
Hot Air Balloon Sales

Runoff

Year To Date Total

1,750.00

05/07/91 800.00

Bredhead, John
P.O. Box 860337

Plano, Tx 75086

Retired

Runoff

Year To Date Total

1,500.00

05/14/91 1,000.00

PAGE TOTAL

3,500.00

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE
AMOUNT

Bredhead, Lucile
P. O. Box 860337
Plano, Tx 75088

Retired

Runoff
Year To Date Total
05/14/91 1,000.00
2,000.00

Brooks, Jesse M., Dr.
P.O. Box 490

Atlanta, Tx 75661

Self Employed
Physician

Runoff
Year To Date Total
05/07/91 1,000.00
1,000.00

Brown, Robert Wade Mr. or Mrs.
6102 Meadow Creek

Gallus, Tx 75240

Runoff
Year To Date Total
05/20/91 1,000.00
1,000.00

Brownfield, Joe A.
P.O. Box 3216

Waco, Tx 76787

Waco Construction, Inc.
General Contractor

Runoff
Year To Date Total
05/14/91 100.00
200.00

PAGE TOTAL

3,200.00

Contributions Year 1991
Committee Members: Linda & Ben Johnson

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE
AMOUNT

Collins, J.R.
Rt. 3, Box 27-E
Farmersville, Tx 76931

E-Systems
V.P.

Runoff 05/14/91 100.00
Year To Date Total 200.00

Collins, Richard W.
222 Lincoln Oaks
2929 Carlisle
Dallas, Tx 75204

Self Employed
Investments

Runoff 05/17/91 1,000.00
Year To Date Total 2,000.00

Colvert, Mrs. C.C.
4100 Jackson St.,
No. 501
Austin, Tx 78731

Runoff 05/14/91 100.00
Year To Date Total 200.00

Cooper, William E.
901 Stemmons Tower East
2700 Stemmons Freeway
Dallas, Tx 75207

Retired

Runoff 05/09/91 1,000.00
Year To Date Total 2,000.00

Contributions from Individuals
Committee Name: Friends of Sen. Johnson

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	TYPE	EMPLOYER	OCCUPATION	DATE	AMOUNT
------	---------	---------	----------------	------	----------	------------	------	--------

Boughty, Ronald M.
3108 Appalochian
Piano, TX 75075

Runoff		05/20/91	100.00
Year To Date Total	200.00		

Gunnar, Sidney W.
9836 Amberton Pwy.
Galles, Tx 75243

Runoff		05/14/91	100.00
Year To Date Total	200.00		

Duncan, Natalie

Self Employed
Southfork Trade Fair

Runoff		05/14/91	1,000.00
Year To Date Total	1,000.00		

Eagle, Mr. Robert M.
6116 Lemon Ave.

Self Employed
Car Dealer

Galles, Tx 75209

Runoff		05/17/91	1,000.00
Year To Date Total	1,000.00		

PAGE TOTAL

3,200.00

91714284196

AZ

Contributions from Individuals & Persons
Committee Name: Friends of Sam Johnson

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	EMPLOYER	OCCUPATION	DATE	AMOUNT
------	---------	---------	----------------	----------	------------	------	--------

Guffey, Roy
1116 One Energy Square
Dallas, Tx 75206

Roy Guffey Oil
Geologist

Runoff
Year To Date Total 2,000.00 05/07/91 1,000.00

Haggard, Rutledge
620 Central Parkway
Ste 101
Plano, Tx 75074

Self Employed
Real Estate

Special
Year To Date Total 250.00 05/03/91 250.00

Guffy, Mrs. Roy
8600 Skyline Dr.
Dallas, Tx 75243

Self Employed
Homemaker

Runoff
Year To Date Total 1,000.00 05/09/91 1,000.00

Hamilton, Ruel W. or Dana S.
6500 Turtle Point
Plano, Tx 75023

Self Employed
Attorney

Runoff
Year To Date Total 200.00 05/20/91 200.00

PAGE TOTAL

2,450.00

Contributions from Individuals / Persons
Committee Members / Friends of Sam Houston

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE
AMOUNT

Wenderson, Bernie G., Jr.
Rt 3, Box 360 A1
Cameron, Tx 76520

Runoff
Year To Date Total 200.00 05/14/91 100.00

Henry, J.E. or Geraldine
3103 Tam O'Shanter
Richardson, Tx 75080

Runoff
Year To Date Total 200.00 05/14/91 100.00

Mill, Lyda M.
3626 Turtle Creek Blvd.
No 15-B
Dallas, Tx 75219

Runoff
Year To Date Total 1,000.00 05/14/91 1,000.00

Mill, Al G., Jr.
6000 Thanksgiving Tower
Dallas, Tx 75201

Self Employed
Investments

Runoff
Year To Date Total 1,500.00 05/10/91 500.00

PAGE TOTAL

1,700.00

Contributions from Individuals & Partners
Committee House Friends of Dan Johnson

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	TYPE	EMPLOYER	OCCUPATION	DATE	AMOUNT
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Muffhines, S. Ray
1001 Colt Road
Box 869269
Plano, Tx 75086

Ray Chevrolet
Auto Dealer

Runoff		06/14/91	100.00
Year To Date Total	300.00		

Howard, Ed or Jo Ann
2603 Berenson Lane

Austin, Tx 78746

Special		04/29/91	250.00
Year To Date Total	250.00		

Hunt, Mrs. M. L.
1446 Ross at Fiel

Dallas, Tx 75202

Retired

Runoff		06/14/91	1,000.00
Year To Date Total	2,000.00		

Morchow, S. Roger or Carolyn P.
5722 Chatham Hill Road

Dallas, Tx 75226

Runoff		06/20/91	500.00
Year To Date Total	500.00		

Contributions from Individuals
Committee Name: Friends of Sam Johnson

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	EMPLOYER OCCUPATION	DATE	AMOUNT
------	---------	---------	----------------	------------------------	------	--------

Hunt, Nancy Ann
1445 Ross at Field

Dallas, Tx 75202

Hunt Consolidated, Inc.
Director

Runoff		05/09/91	1,000.00
Year To Date Total	2,000.00		

Haupt, C.C.
Braver M

Whitesboro, Tx 76273

Holiday Chevrolet
Sales

Special		05/03/91	100.00
Runoff		05/14/91	100.00
Year To Date Total	200.00		

Hutchison, William L.
1700 Pacific Ave.
Suite 2770
Dallas, Tx 75201

Runoff		05/20/91	500.00
Year To Date Total	500.00		

Hunt, Ray L.
1445 Ross at Field

Dallas Tx 75202

Hunt Consolidated, Inc.
Chairman

Runoff		05/10/91	1,000.00
Year To Date Total	2,000.00		

PAGE TOTAL

2,700.00

Contributions from Individuals / Persons
Committee Name: Friends of Sam Johnson

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	EMPLOYER	OCCUPATION	DATE	AMOUNT
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Jaffe, Richard R.
7918 Royal Circle

Dallas, TX 75230

Jaffe Jones & Company
Real Estate Executive

Runoff	05/10/91	100.00
Year To Date Total	200.00	

Jensen, Robert L.
4647 Bronze Way

Dallas, TX 75235

Runoff	05/20/91	200.00
Year To Date Total	200.00	

Johnson, Clifford K.
7219 Lane Park Drive

Dallas, TX 75225

Retired

Runoff	05/10/91	100.00
Year To Date Total	200.00	

Johnson, Gordon R.
1122 Colorado, Suite 200

Austin, TX 78701

Self Employed
Attorney

Runoff	05/10/91	1,000.00
Year To Date Total	2,000.00	

PAGE TOTAL

1,400.00

Contributions from Individuals / Persons
Committee Name: Friends of Sen Johnson

NAME
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE
AMOUNT

Johnson, Robert E., Jr.
1122 Colorado, 0200
Austin, Tx 78701

Self Employed
Attorney

Runoff
Year To Date Total 2,000.00 05/10/91 1,000.00

Johnson, Cliff
1122 Colorado,
West Gate Bldg., Ste. 220
Austin, Tx 78701

Self Employed

Runoff
Year to Date Total 500.00 05/17/91 500.00

Jones, Burton P.
2500 Dockside Ct.

Plano, TX 75093 Retired

Runoff
Year To Date Total 350.00 05/14/91 100.00

Kendrick, Patty B.
3716 Woodrill Dr.

Plano, Tx 75074 Homemaker

Runoff
Year To Date Total 300.00 05/15/91 200.00

PAGE TOTAL 1,000.00

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Class 0

Contributions With Initials / Vendors
Committee Members/Friends of Sam Johnson

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE
AMOUNT

Kilgore, Dr. Bassett D.
8465 Blair Rd., Suite 100
Dallas, Tx 75231

Diagnostic Neuroradiolog
Physician

Runoff
Year To Date Total
06/18/91 500.00
1,000.00

Lake, Brenton G.
3903 Miramar
Dallas, Tx 75206

Lake Rental Oil Company
Executive

Runoff
Year To Date Total
06/17/91 250.00
250.00

Lambert, Ken
P.O.Box 260926
Plano, TX 75026

Midcrest Properties, Inc.
President

Runoff
Year To Date Total
06/18/91 500.00
750.00

Lay, M. Ward
5602 Leblanc Drive
Dallas, Tx 75229

Cross Creek Farms
Owner

Runoff
Year To Date Total
06/09/91 1,000.00
2,000.00

PAGE TOTAL 2,250.00

91014284193

AZ

Standard Receipt
Contributions from Individuals / Persons
Committee Name: Friends of Sam Johnson

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE
AMOUNT

Lardner, M. Thomas
2601 Cedar Springs
Ste. 340
Dallas, Tx 75201

Runoff
Year To Date Total 1,000.00 06/14/91 1,000.00

Lincoln, Charles Henry
16603 Lochmarco Ln.
Dallas, Tx 75240

Today's Temporary
Executive Vice President

Runoff
Year To Date Total 2,000.00 06/10/91 1,000.00

Linthicum, Virginia L.
1445 Ross Avenue
Suite 2600
Dallas, Tx 75202

Runoff
Year To Date Total 2,000.00 06/20/91 1,000.00

Luce, Thomas W.
2800 Bank One Center
1717 Main St.
Dallas, Tx 75201

Self Employed
Lawyer

Runoff
Year To Date Total 500.00 06/17/91 500.00

3,500.00

Page 15 of 31
Line 0

Contributions from Individuals - Version
Committee Name: Friends of Sam Johnson

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE
AMOUNT

Neck, Michael
7552 Baxtershire
Dallas, Tx 75230

Self Employed
Physician

Runoff
Year To Date Total 2,000.00 05/17/91 1,000.00

Madele, Lucian P.
5910 N. Central, No. 1100

Dallas, Tx 75206

Declines to give info

Runoff
Year To Date Total 750.00 05/24/91 250.00

Means, Steven A.
7557 Rambler Rd.
Suite 1300
Dallas, Tx 75231

Paragon Group, Inc
Managing Partner

Runoff
Year To Date Total 1,000.00 05/14/91 500.00

Marquez, Thomas J. or Carolyn G.
5526 Deleache

Dallas, Tx 75220

Self-Employed
Private Investor

Runoff
Year To Date Total 1,000.00 05/14/91 1,000.00

PAGE TOTAL

2,750.00

Contributions from Individuals / Partners
Committee Name: Friends of Sam Johnson

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	EMPLOYER	OCCUPATION	DATE	AMOUNT
------	---------	---------	----------------	----------	------------	------	--------

Melson, Robert B. or Linda
2109 Plantation

Plano, Tx 75093

Exec.

Runoff		05/07/91	500.00
Year To Date Total	500.00		

Nathan, William
2021 Turtle Creek

Dallas, Tx 75219

Runoff		05/14/91	1,000.00
Year To Date Total	1,000.00		

Oates, William D.
4900 Lakeside Drive

Dallas, TX 75205

Lawyers American Title Co
Title Insurance

Runoff		05/09/91	1,000.00
Year To Date Total	2,000.00		

Oberwetter, James Curtis
7029 Meadow Lake Avenue

Dallas, TX 75214

Hunt Oil Company
Vice President

Runoff		05/03/91	250.00
Year To Date Total	500.00		

PAGE TOTAL

2,750.00

Contributions from Individuals / Persons
Committee Name: Friends of Sam Johnson

NAME

ADDRESS

ADDRESS

CITY STATE ZIP

TYPE

EMPLOYER

OCCUPATION

DATE

AMOUNT

Gelson, Stacy
280 Crescent Ct.
Suite 1200
Dallas, Tx 75201

Runoff

06/17/91

500.00

Year To Date Total

500.00

O'Donnell, Peter, Jr.
1401 Elm Street,
Suite 3366
Dallas, Tx 75202

Self Employed
Investments

Runoff

06/16/91

1,000.00

Year To Date Total

1,000.00

Orleans, Neil J. and Joan P.
1928 Baltimore Dr.

Richardson, Tx 75081

Osins, Underkofler
Attorney

Runoff

06/07/91

500.00

Year To Date Total

1,500.00

Peterson, Allan
11498 Luna Road
Suite 102
Dallas, Tx 75234

Runoff

06/14/91

200.00

Year To Date Total

200.00

PAGE TOTAL

2,500.00

91014284206

AZ

Contributions from Individuals / Persons
Committee Name: Friends of Sam Johnson

Page 18 of 31
Line 0

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	EMPLOYER OCCUPATION	DATE	AMOUNT
------	---------	---------	----------------	------------------------	------	--------

Pickens, R. W.
800 Preston Bank Building
Dallas, Tx 75226

Self Employed
Investments

Runoff 05/05/91 1,000.00
Year To Date Total 2,000.00

Porter, Joe W.
4420 McFarlin Blvd.
Dallas, Tx 75206

Runoff 05/14/91 1,000.00
Year To Date Total 1,000.00

Priddy, Ashley M. Mrs.
4222 Arcady Ave.
Dallas, Tx 75206

Runoff 05/28/91 200.00
Year To Date Total 720.00

Rachets, Stephen C.
2520 Evans Dr.
Plano, Tx 75075

Henter Graphics Corp
Sales Manager

Runoff 05/14/91 100.00
Year To Date Total 200.00

PAGE TOTAL

2,900.00

Contributions from Individuals / Persons
Committee Name: Friends of Sam Johnson

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	TYPE	EMPLOYER OCCUPATION	DATE	AMOUNT
------	---------	---------	----------------	------	------------------------	------	--------

Rachbaum, Ralph F.
3801 M. 18th Street
Suite 300
Plano, Tx 75075

Texas Back Institute
Spine Surgeon

Runoff		05/09/91	1,000.00
Year To Date Total	2,000.00		

Raudenbush, Paul E., CPA
1725 Weston Brent Lane

Self Employed
Certified Public Accts

El Paso, Tx 79936

Special		04/29/91	100.00
Runoff		05/30/91	100.00
Year To Date Total	200.00		

Rago, Vincent or Dorothy
407 Thompson Drive

Encore Wire
Executive

Richardson, Tx 75080

Special		04/29/91	500.00
Year To Date Total	500.00		

Ritchie, Mrs. Robert F.
3939 Marquette

Dallas, Tx 75226

Runoff		05/17/91	500.00
Year To Date Total	500.00		

PAGE TOTAL

2,200.00

Contributions from Individuals / Persons
Committee Membership of Sen Johnson

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE
AMOUNT

Roberts, Bob D.
20 Scenic Ridge Drive
Fredericksburg, Tx 78624

Runoff
Year To Date Total 1,000.00 05/14/91 1,000.00

Ritchie, Robert F.
3939 Marquette
Dallas, Tx 75225

Runoff
Year To Date Total 500.00 05/17/91 500.00

Rhea, John M., Jr.
4000 Lexington
Dallas, Tx 75205
Retired

Runoff
Year To Date Total 500.00 05/17/91 500.00

Roberts, Caroline S.
20 Scenic Ridge Drive
Fredericksburg, Tx 78624
Housewife

Special
Year To Date Total 500.00 04/29/91 500.00

PAGE TOTAL 2,000.00

Contributions from Political Candidates / Persons
Committee Name: Friends of Sam Johnson

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	EMPLOYER OCCUPATION	DATE	AMOUNT
------	---------	---------	----------------	------------------------	------	--------

Schwartz, A.R.
1122 Colorado Apt 2102
Austin, Tx 78701

Self-Employed
Attorney

Special	06/03/91	200.00
Runoff	06/20/91	250.00
Year To Date Total		450.00

Shulkin, Allen M.
7777 Forest Lane
Dallas, Tx 76230

Runoff	06/16/91	1,000.00
Year To Date Total		1,000.00

Schoenbrun, Larry
13922 Poyten Dr.

Self Employed
Attorney

Dallas, Tx 76240

Runoff	06/16/91	250.00
Year To Date Total		250.00

Sale, Jim S.
1626 Elm St.
Suite 1000
Dallas, Tx 76201

Runoff	06/14/91	250.00
Year To Date Total		250.00

PAGE TOTAL

1,950.00

91714211

AZ

Contributions from Individuals / Persons
 Committee HomeFriends of San Johnson

NAME	ADDRESS	ADDRESS	CITY STATE ZIP	EMPLOYER	OCCUPATION	DATE	AMOUNT
------	---------	---------	----------------	----------	------------	------	--------

Smith, C. Dan	4312 Aliso			C-Kee Aluminum, Inc.	President		
	Plano, Tx 75074						
Runoff						05/09/91	1,000.00
Year To Date Total							2,000.00

Smith, R.J., Jr.	2626 Cole Avenue			Self Employed	Interior Decorator		
	Suite 603						
	Dallas, Tx 75204						
Runoff						05/20/91	1,000.00
Year To Date Total							2,000.00

Spaeth, Morris	8366 Garland Rd.			Spaeth Communications Inc	President		
	Dallas, Tx 75210						
Runoff						05/07/91	1,000.00
Year To Date Total							1,500.00

Spina, Ivy	2705 Dunwick			Self Employed	Real Estate		
	Plano, Tx 75023						
Runoff						03/16/91	100.00
Year To Date Total							200.00

PAGE TOTAL 3,100.00

Contributions from the Citizens / Friends of the
Committee Name: Friends of the Johnsons

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE AMOUNT

Stahel, R.O.
3848 Ranch Estates Drive
Plano Tx 75074

IBM
Executive

05/15/91 100.00

Runoff
Year To Date Total 100.00

Stanford, Vactor M.
8247 San Leandro
Dallas, Tx 75218

Self employed
Attorney

05/14/91 100.00

Runoff
Year To Date Total 200.00

Stuart, Henry
4505 Claire Chennault
Dallas, Tx 75248

Addison Airport of Tx
Chairman of the Board

05/09/91 1,000.00

Runoff
Year To Date Total 2,000.00

Stearns, Donald J. or Sylbeth
3059 Danalda Dr.

Los Angeles, Ca 90064

05/01/91 250.00
05/20/91 250.00

Special
Runoff
Year To Date Total 500.00

1,700.00

PAGE TOTAL

5
4
3
2
1
0

AZ

Contributions from Individuals / Persons
Committee Name: Friends of Sam Johnson

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE
EMPLOYER
OCCUPATION
DATE
AMOUNT

Swope, Jeffrey L.
3805 Caruth

Dallas, Tx 75226

Champion Property
Consultant

Runoff
Year To Date Total 600.00 05/17/91 250.00

Stuart, Marcia
4505 Claire Chennault

Dallas, Tx 75240

Self Employed
Homemaker

Runoff
Year To Date Total 1,000.00 05/09/91 1,000.00

Terrell, Charles, T.
3508 Armstrong

Dallas, Tx 75206

Unimark Inc Agencies
Insurance Sales

Runoff
Year To Date Total 2,000.00 05/08/91 1,000.00

Thomas, Billie .
9333 Douglas,
Suite 1414
Dallas, Tx 75226

Runoff
Year To Date Total 1,000.00 05/17/91 1,000.00

PAGE TOTAL

9,250.00

Committee Name / Office of Don Johnson

NAME
 ADDRESS
 ADDRESS
 CITY STATE ZIP T. EMPLOYER
 TYPE OCCUPATION DATE AMOUNT

Williams, Lucious
 8200 Brookriver

Dallas, TX 75247

Dikita Engineering
 President/CEO

Runoff 06/17/91 200.00
 Year To Date Total 300.00

Wiederkehr, A.M.
 3347 Surrey Circle

Dallas, Tx 75209

Self Employed
 Consultant

Runoff 06/14/91 1,000.00
 Year To Date Total 1,000.00

Wills, Don
 8949 Sherry Lane
 Suite 620
 Dallas, Tx 75228

Runoff 06/24/91 200.00
 Year To Date Total 100.00

Wilson, Malcolm E.
 10432 Barrywood

Dallas, Tx 75230

Self Employed
 Investments

Runoff 06/14/91 200.00
 Year To Date Total 300.00

PAGE TOTAL 3,000.00

91214284220

AZ

NAME
 ADDRESS
 ADDRESS

CITY STATE ZIP
 TYPE

DATE AMOUNT

American Neap PAC
 840 North Lake Shore Dr.

Chicago, IL 60611

Runoff 06/28/91 500.00
 Year To Date Total 500.00

Associated General Contractors-PAC
 1957 E. Street N.W.

Washington, DC 20006

Special 06/03/91 1,000.00
 Year To Date Total 1,000.00

American Dental Political Action Committee
 1111-14th St. N.W.
 Suite 1100
 Washington, DC 20006

Runoff 06/17/91 1,000.00
 Year To Date Total 1,000.00

Arco PAC
 3013 Malibu Place

Plano, TX 75023

Special 06/03/91 100.00
 Special 06/14/91 1,000.00
 Runoff 06/24/91 55.00
 Year To Date Total 1,155.00

PAGE TOTAL 3,055.00

91314294223

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE

DATE AMOUNT

Dealers Election Action Committee
8400 Westpark Drive
Mc Lean, VA 22102

Special 05/14/91 1,000.00
Year To Date Total 1,000.00

E-System Corporate PAC
P.O. Box 660240
Dallas, TX 75266-0240

Runoff 05/28/91 750.00
Year To Date Total 750.00

E-System Greenville Division
P.O. Box 6056 COM 48
Greenville, TX 76403-6056

Runoff 05/28/91 750.00
Year To Date Total 2,000.00

Empac, Central Region New Chemical
2401 Brazosport Blvd.
Freeport, Tx 77541

Special 05/14/91 1,000.00
Year To Date Total 2,000.00

PAGE TOTAL

3,000.00

Contributors to the
Committee to Re-elect John D. Dingell

NAME
ADDRESS
CITY STATE ZIP
TYPE

DATE AMOUNT

J & G PAC
900 Jackson St. Ste 100
Dallas, Tx 75202

Special 05/08/91 250.00
Year To Date Total 250.00

McDonald's PAC
One McDonald's Plaza
Oak Brook, IL 60521

Special 05/07/91 1,000.00
Year To Date Total 1,000.00

Jim Murrell Campaign
3201 Greenbrier
Plano, Tx 75074

Runoff 05/12/91 400.00
Year To Date Total 400.00
sig: murrells

OPNTNPAC
1101 Vermont Avenue, N.W.
Suite 300
Washington, DC 20005-3570

Special 05/17/91 3,000.00
Year To Date Total 3,000.00

PAGE TOTAL 4,600.00

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE

DATE AMOUNT

MCNB Texas PAC
P. O. Box 891000

Dallas, Tx 75283-1000

Runoff 06/24/91 2,000.00
Year To Date Total 2,000.00

Northeast Texas Optometric Society
801 Central Expressway

Plano, Tx 75075

Special 06/03/91 1,000.00
Year To Date Total 1,000.00

NATS PAC
110 Saint Asaph Street

Alexandria, VA 22314

Special 06/10/91 500.00
Year To Date Total 1,000.00

NI Industries, Inc. PAC
P. O. Box 60006

Houston, Tx 77266

Special 06/14/91 3,000.00
Year To Date Total 3,000.00

PAGE TOTAL

7,000.00

AZ

06/17/91

Page 5 of 11
Line 0

Itemized Receipts
Contributions from Party Committees
Committee Name: Friends of Sam Johnson

NAME
ADDRESS
ADDRESS
CITY STATE ZIP
TYPE

DATE AMOUNT

Empac-Texas Power & Light
P. O. Box 660268

Dallas, Tx 75266-0268

Special
Year To Date Total 5,000.00

06/03/91 2,000.00

Enserch Employee Political Support Assoc
300 S. St. Paul St.

Dallas, Tx 75201

Special
Year To Date Total 500.00

06/17/91 500.00

Friends of Leedom for Senate
Ross at Central

Dallas, Tx 75201

Runoff
Year To Date Total 200.00

06/17/91 100.00

GTE PAC
1850 M Street, N. W.
Suite 1200
Washington, D.C. 20036

Special
Year To Date Total 1,500.00

04/29/91 500.00

PAGE TOTAL

3,100.00

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name	: Jesse M. Brooks	Amount: 1000.00
Address	: P. O. Box 490	
City, State	ZIP: Atlanta, Tx. 75551	Date : 5-7-91
Employer	: Self	
Occupation	: Physician	
Name	: Merrie Spaeth	Amount: 1000.00
Address	: 8366 Garland Rd.	
City, State	ZIP: Dallas, Texas 75218	Date : 5-7-91
Employer	: Spaeth Communications	
Occupation	: President	
Name	: Roy Guffey	Amount: 1000.00
Address	: 1116 One Energy Square	
City, State	ZIP: Dallas, Tx. 75206	Date : 5-7-91
Employer	: Roy Guffey Oil Co.	
Occupation	: Owner	
Name	: McDonald's Pac	Amount: 1000.00
Address	: One McDonald's Plaza	
City, State	ZIP: Oak Brook, Il. 60521	Date : 5-7-91
Employer	:	
Occupation	:	
Name	: TU ELEC EM-PAC	Amount: 2000.00
Address	: P. O. Box 660268	
City, State	ZIP: Dallas, Tx. 75266-0268	Date : 5-7-91
Employer	:	
Occupation	:	
Name	:	Amount:
Address	:	
City, State	ZIP:	Date :
Employer	:	
Occupation	:	
Name	:	Amount:
Address	:	
City, State	ZIP:	Date :
Employer	:	
Occupation	:	

MEMORANDUM FOR FILES: Telecon

SUBJECT: 48 Hour Notices

FROM: Jim Murrell

TO: Andrew Zehe, RAD

NAME OF COMMITTEE: Friends of Sam Johnson

DATE: 6-13-91

Mr. Murrell called to ask about the 48 Hour Notice requirements. He stated that the Committee had not filed any notices. The analyst listed the dates on which notices were required. He stated that the Committee had never received a copy of the prior notice and that the Committee was amending its procedure. The analyst told him that he would send a copy of the prior notice to the Committee.

MEMORANDUM FOR FILES: Telecon

SUBJECT: 12 R RFAI

FROM: Leon Bennett

TO: Andrew Zehe, RAD

NAME OF COMMITTEE: Friends of Sam Johnson

DATE: 6-26-91

Mr. Bennett asked about the missing 48 Hour Notices. The analyst stated that they would probably result in a *referral* to our Office of General Counsel. He mentioned the fact that the Committee had not received the Prior Notice which listed the 43 Hour reporting requirements. He added that he was sending in a letter which would outline the Committee's policy on 48 Hour Notices and would include a list of those contributions for which 48 Hour Notices should have been filed.

HAND DELIVERED

Lyndon F. Boseman
Treasurer
Friends of Sam Johnson
P. O. Box 797866
Dallas, Texas 75379

HAND DELIVERED

135959

July 2, 1991

The Honorable Donald Anderson
Clerk of the House of Representatives
1036 Longworth House Office Building
Washington, D. C. 20515

Identification Number: C00250720

Reference: 12 Day Pre-Runoff Report (4/15/92 - 4/28/92)

Dear Mr. Anderson:

This letter is in response to correspondence to me as, Treasurer, Friends of Sam Johnson, dated June 5, 1991 and bearing the above identification number and reference. The order of this response is the same as the unnumbered paragraphs in Mr. Andrew Zehe's letter of June 5, 1991.

The first paragraph suggests a gap in the coverage dates of our reports, and requests an amended 12 day Pre-Special and Pre-Runoff report be filed. The amended 12 day Pre-Special and Pre-Runoff reports are under Tab A-1 and A-2 of this letter respectfully. The original report has a typographical error in the date for the period covered by the report. The original report indicates that the period covered was "through 4/4/91" and it should have read "through 4/14/91." The same typographical error occurred on the accompanying "Detailed Summary Page." As a result of the recommendation or concerns contained in the June 5, 1991 letter, I have also amended the report and Summary Page in some other regards, which are addressed more fully in subsequent paragraphs.

The second paragraph addresses specific omissions of figures in the summary and Detailed Summary Page. Those figures have been provided in the amended report.

The third paragraph indicates a "possible discrepancy in ..." the "... aggregate year-to-date totals." This problem originally resulted from a problem with the computer

917143-272

The Honorable Donald Anderson
July 2, 1991
Page 2

program and was compounded by our failure to catch all of the computer non-aggregation when reviewed by hand. I believe each of these discrepancies in regard to aggregate year-to-date totals has been corrected and those corrections are contained in the amended report. The deficiency with the computer program has been corrected and a checklist for the review of the report is being prepared to protect against future reports containing such discrepancies. All campaign contributions were received in calendar year 1991.

The fourth paragraph sets forth a failure to abide by the 48 hour notice regarding "last minute" contributions. Any failure to meet the 48 hour notice requirement was wholly inadvertent. All contributions subject to this 48 hour notice requirement were included in the next report required to be filed. I do think that it is very important that the circumstances surrounding any oversight be understood. This special election was a result of the unexpected resignation of Congressman Bartlett during the middle of his term. The campaign was during a special election called to fill the vacancy and took place in the Spring at a time when there were no other Federal elections taking place.

Because of the extremely short time in which to organize this campaign (Bartlett's resignation on March 11, 1991 and the election on May 4, 1991 and the runoff on May 18, 1991), and the diffusion of experienced election support personnel over a field of 12 republican candidates and one democratic candidate, we relied heavily on the written information and guides made available from the FEC. Although the "Campaign Guide" sets out the notice requirement for the last minute contribution, it is only one small paragraph in the middle of almost 62 pages of instructions. There are no sample forms in the "Guide" to the report on last minute contributions.

Neither the candidate nor I received the filing dates for reports set by the commission until after this issue was raised in the letter of June 5. It was only after the receipt of the June 5 letter that I became aware of, requested and received on the 19th of June, 1991, the "Report of Notice" of April 4, 1991. This material makes it very clear what the reporting obligations are and how and where the 48 hour rule is applied. I believe it is worth noting that these coverage period dates are different from the coverage period dates applicable to non-special elections.

Had we received the notice from the Commission required by 2 USC Section 434 (a) (9) consistent with our

The Honorable Donald Anderson
July 2, 1991
Page 3

performance in other areas, we would have assuredly given the notices required by "last minute" contributions. It seems that the confusion of a special election was anticipated by the language of subsection (9). I respectfully request that the Commission waive the "last minute" reporting obligation in this special election which the Commission may do as provided in subsection (9). All "last minute" reporting notices for this special election were within 10 days of a filed "report required under this subsection." It is also worth pointing out that the reporting dates that we were made aware of either came as a notice from the State or by word of mouth.

We also believe the Commission should find these circumstances taken as a whole should result in a case where the Commission "otherwise terminates its proceedings..." pursuant to 11 CFR Section 111.9 (b). As the rest of the June 5 letter indicates we may have made some unintentional drops and typographical errors and we may have unintentionally complicated the reports by somewhat over reporting on Schedule A; however, we have not intentionally failed in any regard and certainly have not intended to avoid the filing of notices required for "last minute" contributions. Tab B contains a set of reports as we believe they should have been reported according to the filing date schedule recently received. Each report represents the reportable contributions received on the date of the report. In the future such reports will be timely made in accordance with FEC requirements. In addition, I have instituted specific written policy/guidelines for the Committee on this subject which is at Tab C.

Paragraphs five and six of the June 5, letter requests occupation and employee identification for contributors listed in Schedule A where that information was not provided. The amended reports have deleted from the itemized Schedule A all contributions of \$200.00 or less and has provided those contribution totals as required at line 11. (a) (ii) on the Detailed Summary Page. For those contributors listed in Schedule A of the amended report and for whom occupation and name of employer was not shown, the Committee has contacted or attempted to contact those persons by telephone. When telephone contact was not successful in obtaining this information, each person was mailed a letter requesting them to provide the needed information. The amended Schedule A includes all additional information obtained through the date of this response. Should additional information be received by the Committee, it will be supplied to you promptly. Tab D has a sample letter used in requesting this information as well as

The Honorable Donald Anderson
July 8, 1991
Page 6

solicitation materials which clearly requests this information from contributors and carefully points out that the requested information is required by law. The Committee has also drafted a written policy of guidelines to assist those working for the Committee in understanding the legal requirements and how the Committee will carry out its responsibilities in gathering and reporting the required information.

Paragraph seven highlights the over reporting that the Committee provided in Schedule A on contributions of \$200 or less. As pointed out in preceding paragraphs, the amended reports have corrected this, and all future reports will follow this method of reporting.

91714-9-271

Throughout the election all of us involved in gathering the information and filing the reports were volunteers. Everyone did their best to focus on the job at hand and comply with the election laws. Neither I nor anyone responsible for filing reports did knowingly or willfully fail to give the notices required by the "last minute" contribution reports. At no time were any short cuts considered acceptable. Everyone involved, including myself has learned a great deal from this experience. In addition to generating Committee policy/guidelines statements, which are supplemental to the materials furnished by the FEC, I have formed a special internal audit committee to assist the Committee and particularly the Treasurer in compliance with the election laws in general and the reporting requirements in particular. The Audit Committee is composed of: Treasurer of the Committee, as chair; the CPA who actually prepares the reports, the Assistant Treasurer who will have primary responsibility for gathering information for the reports, the campaign manager, and the campaign attorney. The Audit Committee will meet regularly during the election year and will meet on call during off years.

CP

In the event there is a need to discuss any of these matters, please do not hesitate to call on me.

Very truly yours,



Lyndon T. Boreman,
Treasurer

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: **Sam Johnson**
U.S. House of Representatives
Texas/3rd District

Name : Charles B. Key Amount: 1000.00
 Address : 2801 Lemmon Ave. West
 City, State ZIP: Dallas, Tx. 75204 Date : 4-18-91
 Employer : Self
 Occupation : Ophthalmologist

1. Name : Mrs. Percy Bozeman Amount: 1000.00
 Address : 1729 Callaway
 City, State ZIP: Plano, Tx. 75075 Date : 4-18-91
 Employer : Self
 Occupation : Investments

2. Name : Amount:
 Address :
 City, State ZIP: Date :
 Employer :
 Occupation :

3. Name : Amount:
 Address :
 City, State ZIP: Date :
 Employer :
 Occupation :

4. Name : Amount:
 Address :
 City, State ZIP: Date :
 Employer :
 Occupation :

5. Name : Amount:
 Address :
 City, State ZIP: Date :
 Employer :
 Occupation :

6. Name : Amount:
 Address :
 City, State ZIP: Date :
 Employer :
 Occupation :

P.O. Box 797866 ★ Dallas, Texas 75379-7866 ★ 214-265-1901 (Dallas County) ★ 214-596-1420 (Collin County)

Paid for by Friends of Sam Johnson

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name	: Amanullah Khan	Amount	: 1000.00
Address	: 6717 Talmadge	Date	: 4-22-91
City, State	: ZIP: Dallas, Tx. 75204		
Employer	: Cancer Center Assocs.		
Occupation	: Physician		
Name	: GTE PAC	Amount	: 1000.00
Address	: 1850 M Street N. W.	Date	: 4-22-91
City, State	: ZIP: Washington, D.C. 20036		
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:	Date	:
City, State	: ZIP:		
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:	Date	:
City, State	: ZIP:		
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:	Date	:
City, State	: ZIP:		
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:	Date	:
City, State	: ZIP:		
Employer	:		
Occupation	:		

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name : William D. Oates Amount: 1000.00
Address : 4900 Lakeside Dr.
City, State ZIP: Dallas, Tx. 75205 Date : 4-23-91
Employer : Lawyers American Title
Occupation : Title Insurance

1 Name : Amount:
2 Address :
3 City, State ZIP: Date :
4 Employer :
5 Occupation :

6 Name : Amount:
7 Address :
8 City, State ZIP: Date :
9 Employer :
0 Occupation :

1 Name : Amount:
2 Address :
3 City, State ZIP: Date :
4 Employer :
5 Occupation :

6 Name : Amount:
7 Address :
8 City, State ZIP: Date :
9 Employer :
0 Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson,
U.S. House of Representatives
Texas/3rd District

Name	: HCA PAC	Amount:	1000.00
Address	: 1 Park Plaza P. O. Box 550		
City, State	ZIP: Nashville, Tn. 37202	Date	: 4-24-91
Employer	:		
Occupation	:		
Name	: Mrs. John (Lucille) Brodhead	Amount:	1000.00
Address	: P. O. Box 860337		
City, State	ZIP: Plano, Tx. 75086	Date	: 4-24-91
Employer	: Retired		
Occupation	:		
Name	: Penny PAC	Amount:	1000.00
Address	: P. O. Box 659000		
City, State	ZIP: Dallas, Tx. 75265-9000	Date	: 4-24-91
Employer	:		
Occupation	:		
Name	: AOPA PAC	Amount:	1000.00
Address	: 421 Aviation Way		
City, State	ZIP: Frederick, Md. 20701	Date	: 4-24-91
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State	ZIP:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State	ZIP:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State	ZIP:	Date	:
Employer	:		
Occupation	:		

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name : PENNY PAC Amount: 1000.00
Address : P. O. Box 659000
City, State ZIP: Dallas, Tx. 75265-9000 Date : 4-25-91
Employer :
Occupation :

Name : Daniel M. Murphy Amount: 1000.00
Address : 200 Crescent Ct. #1870
City, State ZIP: Dallas, Tx. 75201 Date : 4-25-91
Employer : Self
Occupation : Attorney

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: **Sam Johnson**
U.S. House of Representatives
Texas/3rd District

Name : AMOCA PAC Amount: 1000.00
Address : 200 E. Randolph Dr. MC 3705
City, State ZIP: Chicago, Il. 60601 Date 4-26-91
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name	: Lyndon T. Bozeman	Amount:	1000.00
Address	: P. O. Box 861051		
City, State ZIP:	Plano, Tx. 75086	Date	: 5-1-91
Employer	: Self		
Occupation	: Real Estate		
- Name	:	Amount:	
Address	:		
- City, State ZIP:	:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
- City, State ZIP:	:	Date	:
Employer	:		
Occupation	:		
- Name	:	Amount:	
Address	:		
- City, State ZIP:	:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State ZIP:	:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State ZIP:	:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State ZIP:	:	Date	:
Employer	:		
Occupation	:		

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: **Sam Johnson**
U.S. House of Representatives
Texas/3rd District

Name	: Jesse M. Brooks	Amount: 1000.00
Address	: P. O. Box 490	
City, State	ZIP: Atlanta, Tx. 75551	Date : 5-7-91
Employer	: Self	
Occupation	: Physician	
 Name	 : Merrie Spaeth	 Amount: 1000.00
Address	: 8366 Garland Rd.	
City, State	ZIP: Dallas, Texas 75218	Date : 5-7-91
Employer	: Spaeth Communications	
Occupation	: President	
 Name	 : Roy Guffey	 Amount: 1000.00
Address	: 1116 One Energy Square	
City, State	ZIP: Dallas, Tx. 75206	Date : 5-7-91
Employer	: Roy Guffey Oil Co.	
Occupation	: Owner	
 Name	 : McDonald's Pac	 Amount: 1000.00
Address	: One McDonald's Plaza	
City, State	ZIP: Oak Brook, Il. 60521	Date : 5-7-91
Employer	:	
Occupation	:	
 Name	 : TU ELEC EM-PAC	 Amount: 2000.00
Address	: P. O. Box 660268	
City, State	ZIP: Dallas, Tx. 75266-0268	Date : 5-7-91
Employer	:	
Occupation	:	
 Name	 :	 Amount:
Address	:	
City, State	ZIP:	Date :
Employer	:	
Occupation	:	
 Name	 :	 Amount:
Address	:	
City, State	ZIP:	Date :
Employer	:	
Occupation	:	

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name : R. H. Pickens Amount: 1000.00
Address : 900 Preston Bank Bldg.
City, State ZIP: Dallas, Tx. 75225 Date : 5-8-91
Employer : Self
Occupation : Investments

Name : Charles T. Terrell Amount: 1000.00
Address : 3508 Armstrong
City, State ZIP: Dallas, Tx. 75205 Date : 5-8-91
Employer : Unimark Ins. Agencies
Occupation : Insurance Sales

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Name : Amount:
Address :
City, State ZIP: Date :
Employer :
Occupation :

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name	: Henry Stuart	Amount: 1000.00
Address	: 4505 Claire Chennault	
City, State	ZIP: Dallas, Tx. 75248	Date : 5-9-91
Employer	: Addison Airport	
Occupation	: Chairman	
Name	: Marcia Stuart	Amount: 1000.00
Address	: 4505 Claire Chennault	
City, State	ZIP: Dallas, Tx. 75248	Date : 5-9-91
Employer	: Homemaker	
Occupation	:	
Name	: Mrs. Roy Guffey	Amount: 1000.00
Address	: 8600 Skyline	
City, State	ZIP: Dallas, Tx. 75243	Date : 5-9-91
Employer	: Homemaker	
Occupation	:	
Name	: William Oates	Amount: 1000.00
Address	: 4900 Lakeside	
City, State	ZIP: Dallas, Tx. 75205	Date : 5-9-91
Employer	: Lawyers American Title	
Occupation	: Title Insurance	
Name	: William E. Cooper	Amount: 1000.00
Address	: 2700 Stemmons Frwy. #901	
City, State	ZIP: Dallas, Tx. 75207	Date : 5-9-91
Employer	: Retired	
Occupation	:	
Name	: H. Ward Lay	Amount: 1000.00
Address	: 2323 Bryan St. LB 118	
City, State	ZIP: Dallas, Tx. 75201	Date : 5-9-91
Employer	: Cross Creek Farms	
Occupation	: Owner	
Name	: Nancy Ann Hunt	Amount: 1000.00
Address	: 1445 Ross Ave.	
City, State	ZIP: Dallas, Tx. 75202-2785	Date : 5-9-91
Employer	: Hunt Consolidated	
Occupation	: Director	

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name	: Louis Beecherl, Jr.	Amount: 1000.00
Address	: 3801 Beverly Dr.	
City, State	ZIP: Dallas, Tx. 75205	Date : 5-9-91
Employer	: Self	
Occupation	: Oil and Gas Investments	
Name	: C. Dan Smith	Amount: 1000.00
Address	: 624 Krona #110	
City, State	ZIP: Plano, Tx. 75074	Date : 5-9-91
Employer	: C-KOE Aluminum, Inc.	
Occupation	: President	
Name	: Ralph Rashbaum	Amount: 1000.00
Address	: 3801 W. 15th St. #300	
City, State	ZIP: Plano, Tx. 75075	Date : 5-9-91
Employer	: North Texas Back Institute	
Occupation	: Physician	
Name	:	Amount:
Address	:	
City, State	ZIP:	Date :
Employer	:	
Occupation	:	
Name	:	Amount:
Address	:	
City, State	ZIP:	Date :
Employer	:	
Occupation	:	
Name	:	Amount:
Address	:	
City, State	ZIP:	Date :
Employer	:	
Occupation	:	
Name	:	Amount:
Address	:	
City, State	ZIP:	Date :
Employer	:	
Occupation	:	

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name	: Wendy Boothe	Amount: 1000.00
Address	: 2713 Winfield	
City, State	ZIP: Plano, Tx. 75023	Date : 5-10-91
Employer	: Homemaker	
Occupation	:	
Name	: Ray L. Hunt	Amount: 1000.00
Address	: 1455 Ross Ave.	
City, State	ZIP: Dallas, Tx. 75202-2785	Date : 5-10-91
Employer	: Hunt Consolidated	
Occupation	: CEO	
Name	: Charles Henry Lincoln	Amount: 1000.00
Address	: 16503 Lochmaree	
City, State	ZIP: Dallas, Tx. 75248	Date : 5-10-91
Employer	: Todays Temporary	
Occupation	: Executive Vice-President	
Name	: Robert E. Johnson	Amount: 1000.00
Address	: 1122 Colorado #208	
City, State	ZIP: Austin, Tx. 78701	Date : 5-10-91
Employer	: Self	
Occupation	: Attorney	
Name	: Gordon R. Johnson	Amount: 1000.00
Address	: 1122 Colorado #208	
City, State	ZIP: Austin, Tx. 78701	Date : 5-10-91
Employer	: Self	
Occupation	: Attorney	
Name	:	Amount:
Address	:	
City, State	ZIP:	Date :
Employer	:	
Occupation	:	
Name	:	Amount:
Address	:	
City, State	ZIP:	Date :
Employer	:	
Occupation	:	

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name	: ARCO PAC	Amount: 1000.00
Address	: 1601 Bryan St.	
City, State ZIP	: Dallas, Tx. 75201	Date : 5-14-91
Employer	:	
Occupation	:	
Name	: Caroline Roberts	Amount: 1000.00
Address	: 20 Scenic Ridge Dr.	
City, State ZIP	: Fredericksburg, Tx. 78624	Date : 5-14-91
Employer	: Homemaker	
Occupation	:	
Name	: Mrs. H. L. Hunt	Amount: 1000.00
Address	: 1445 Ross Ave.	
City, State ZIP	: Dallas, Texas 75202-2785	Date : 5-14-91
Employer	: Retired	
Occupation	:	
Name	: Thomas J. Marquez	Amount: 1000.00
Address	: 5526 De Loache	
City, State ZIP	: Dallas, Tx. 75220	Date : 5-14-91
Employer	: Self	
Occupation	: Investments	
Name	: A. M. Wiederkehr	Amount: 1000.00
Address	: 5347 Surrey Circle	
City, State ZIP	: Dallas, Tx. 75209	Date : 5-14-91
Employer	: Self	
Occupation	: Consultant	
Name	: Lyda Hill	Amount: 1000.00
Address	: 3525 Turtle Creek #15-B	
City, State ZIP	: Dallas, Tx. 75219	Date : 5-14-91
Employer	: Retired	
Occupation	:	
Name	: Jas. W. Porter	Amount: 1000.00
Address	: 4420 Mc Farlin	
City, State ZIP	: Dallas, Tx. 75205	Date : 5-14-91
Employer	: Gifford-Hill	
Occupation	: Pres.	

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name	: N. L. Industries, Inc. PAC	Amount: 3000.00
Address	: P. O. Box 60085	
City, State	ZIP: Houston, Tx. 77205	Date : 5-14-91
Employer	:	
Occupation	:	
Name	: John Brodhead	Amount: 1000.00
Address	: Box 337	
City, State	ZIP: Plano, Texas 75086	Date : 5-14-91
Employer	: Retired	
Occupation	:	
Name	: Lucille Brodhead	Amount: 1000.00
Address	: Box 337	
City, State	ZIP: Plano, Tx. 75086	Date : 5-14-91
Employer	: Retired	
Occupation	:	
Name	: Natalie Duncan	Amount: 1000.00
Address	: 16035 Chalfont Pl.	
City, State	ZIP: Dallas, Texas 75248	Date : 5-14-91
Employer	: Southfork Trade Fair	
Occupation	: Owner	
Name	: William A. Boothe	Amount: 1000.00
Address	: P. O. Box 181027	
City, State	ZIP: Dallas, Tx. 75218	Date : 5-14-91
Employer	: Self	
Occupation	: Physician	
Name	: NADA PAC	Amount: 1000.00
Address	: 412 Frist St. S E	
City, State	ZIP: Washington D. C. 20003	Date : 5-14-91
Employer	:	
Occupation	:	
Name	: Dow Chemical EMPAC	Amount: 1000.00
Address	: 2401 Brazosport Blvd.	
City, State	ZIP: Freeport, Tx. 77541	Date : 5-14-91
Employer	:	
Occupation	:	

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: . Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name	: William Nathan	Amount:	1000.00
Address	: 2821 Turtle Creek		
City, State	ZIP: Dallas, Tx. 75219	Date	: 5-14-91
Employer	: Self		
Occupation	: Investments		
Name	: M. Thomas Lardner	Amount:	1000.00
Address	: 2501 Cedar Springs #340		
City, State	ZIP: Dallas, Tx. 75201	Date	: 5-14-91
Employer	: Self		
Occupation	: Investments		
Name	:	Amount:	
Address	:		
City, State	ZIP:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State	ZIP:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State	ZIP:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State	ZIP:	Date	:
Employer	:		
Occupation	:		

Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: Sam Johnson
U.S. House of Representatives
Texas/3rd District

Name	: Peter J. O'Donnell	Amount:	1000.00
Address	: 1401 Elm St. #3366		
City, State ZIP	: Dallas, Tx. 75202	Date	5-15-91
Employer	: Self		
Occupation	: Investments		
Name	: Allan N. Shulkin	Amount:	1000.00
Address	: 1777 Forest Lane		
City, State ZIP	: Dallas, Tx. 75230	Date	5-15-91
Employer	: Self		
Occupation	: Physician		
Name	:	Amount:	
Address	:		
City, State ZIP	:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State ZIP	:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State ZIP	:	Date	:
Employer	:		
Occupation	:		
Name	:	Amount:	
Address	:		
City, State ZIP	:	Date	:
Employer	:		
Occupation	:		

Sam Johnson

★ U.S. CONGRESS ★

"Last-Minute Contributions"

The following procedures are for reporting special notices of "Last-Minute Contributions" of \$1000.00 or more after the 20th day, but not more than 48 hours, before an election.

1. Photocopy all contributions.
2. Prepare a facsimile transmittal report listing all contributions of \$1000.00 or more.
 - A. The report must include the following information.
 - i. The candidate's name and the office he is seeking;
 - ii. The identification of each contributor, including;
 - a. Name,
 - b. Address,
 - c. Employer and,
 - d. Occupation;
 - iii. The amount and date of receipt of the contribution.
 - B. If any of the above information is not available, then follow the procedures for obtaining all required information.
3. Transmit the facsimile report to the Clerk of the House at 202-225-7781.
4. Verify the receipt of the transmission by calling the Clerk of the House.
5. Assemble the original report, including your signature and the date of the confirmation of receipt, and file accordingly.



Transmittal Sheet

Date: _____ Time: _____

No. of pages (including this page) _____

DELIVER TO _____

Name: Clerk of the House

Fax Number: 1-202-225-7781

Re: "LAST MINUTE CONTRIBUTIONS"

FROM: SAM JOHNSON 214-422-4797

Comments: "FRIENDS OF SAM JOHNSON"

P. O. Box 797866
Dallas, Texas 75379-7866

Lyndon T. Bozeman, Treasurer



Sam Johnson

★ U.S. CONGRESS ★

48-hour Report of "Last-Minute Contributions"

For: **Sam Johnson**
U.S. House of Representatives
Texas/3rd District

Name	:	Amount:
Address	:	
City, State ZIP:		Date :
Employer	:	
Occupation	:	
2 Name	:	Amount:
2 Address	:	
2 City, State ZIP:		Date :
2 Employer	:	
2 Occupation	:	
3 Name	:	Amount:
3 Address	:	
3 City, State ZIP:		Date :
3 Employer	:	
3 Occupation	:	
- Name	:	Amount:
- Address	:	
- City, State ZIP:		Date :
- Employer	:	
- Occupation	:	
6 Name	:	Amount:
6 Address	:	
6 City, State ZIP:		Date :
6 Employer	:	
6 Occupation	:	
Name	:	Amount:
Address	:	
City, State ZIP:		Date :
Employer	:	
Occupation	:	
Name	:	Amount:
Address	:	
City, State ZIP:		Date :
Employer	:	
Occupation	:	

P.O. Box 797866 ★ Dallas, Texas 75379-7866 ★ 214-265-1491 (Dallas County) ★ 214-946-1940 (Collin County)

Paid for by Friends of Sam Johnson



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

89-5

AS 2 100

Lyndon Boseman, Treasurer
Friends of Sam Johnson
P.O. Box 797866
Dallas, TX 75379

Identification Number: C00250720

Reference: 30 Day Post-Runoff Report (4/29/91-6/7/91)

Dear Mr. Boseman:

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 indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee from April 15, 1991 through May 1, 1991 for the Special Election and from May 5, 1991 through May 15, 1991 for the Runoff Election. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration.
(11 CFR §104.5(f))

Any amendment or clarification should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515. 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,

Andrew Zehe

Andrew Zehe
Reports Analyst
Reports Analysis Division

2103707722

RECEIVED
F.E.C.
SECRET
91 OCT -2 PM 5:15

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral #91L-82
STAFF MEMBER: Veronica Gillespie

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

RESPONDENTS: Friends of Sam Johnson
and Lyndon Bozeman, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(6)

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on August 30, 1991. Attachment 1. The basis for the attached referral is the failure of the Friends of Sam Johnson and Lyndon Bozeman, as treasurer ("Committee"), to file forty (40) required 48 Hour notifications ("48 Hour Notices") for contributions totaling \$43,000 received prior to the 1991 Special Run-off Election. Samuel Robert Johnson won the 1991 Special Run-off Election in the Third Congressional District in the State of Texas with 52 percent of the vote.

II. FACTUAL AND LEGAL ANALYSIS

See Attachment 2.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Friends of Sam Johnson and Lyndon Bozeman, as treasurer, violated 2 U.S.C. § 434(a)(6), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the appropriate letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

Date 10/8/91

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

1. Referral Materials
2. Factual and Legal Analysis
3. Proposed Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Friends of Sam Johnson and) RAD Referral #91L-82
Lyndon Bozeman, as treasurer.)

(MUR
3433)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 15, 1991, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #91L-82:

1. Open a MUR.
2. Find reason to believe that the Friends of Sam Johnson and Lyndon Bozeman, as treasurer, violated 2 U.S.C. § 434(a)(6), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the appropriate letter, Factual and Legal Analysis, and proposed conciliation agreement, as recommended in the General Counsel's Report dated October 8, 1991.

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

Attest:

10-15-91
Date

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

Received in the Secretariat: Wed. Oct. 9, 1991 5:05 p.m.
Circulated to the Commission: Thurs. Oct. 10, 1991 11:00 a.m.
Deadline for vote: Tues., Oct. 15, 1991 11:00 a.m.

dr



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 23, 1991

Lyndon Bozeman, Treasurer
Friends of Sam Johnson
P.O. Box 797866
Dallas, TX 75379

RE: MUR 3433
Friends of Sam Johnson

Dear Mr. Bozeman:

On October 15, 1991, the Federal Election Commission found that there is reason to believe the Friends of Sam Johnson ("Committee") and Lyndon Bozeman, as treasurer, violated 2 U.S.C. § 434(a)(6), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Friends of Sam Johnson and Lyndon Bozeman, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against Friends of Sam Johnson and Lyndon Bozeman, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer 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.

Lyndon Bozeman, Treasurer
Page 2

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, 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.

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 the General Counsel ordinarily will not 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 authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the 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 Veronica M. Gillespie, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Joan D. Aikens
Vice Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

**FEDERAL ELECTION COMMISSION
FACTUAL & LEGAL ANALYSIS**

MUR 3433

RESPONDENTS: Friends of Sam Johnson
and Lyndon Bozeman, as treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, and the Secretary of State, as appropriate, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. Id. The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

The Special Run-off Election in the state of Texas was held on May 18, 1991. Pursuant to the Act, the Respondents were required to notify the Commission, in writing, of all

contributions of \$1,000 or more received from May 5 to May 15, 1991, within 48 hours of their receipt. A review of the Committee's 1991 30 Day Post Run-off Report identified forty (40) contributions received from May 7th through May 15, 1991, of \$1,000 or more totaling \$43,000. The Committee did not submit 48 Hour Notices for these contributions:¹

<u>CONTRIBUTOR</u>	<u>DATE</u>	<u>AMOUNT</u>
Louis A. Beecherl, Jr.	05/09/91	\$1,000
Wendy J. Boothe	05/10/91	\$1,000
William A. Boothe, MD	05/14/91	\$1,000
John Brodhead	05/14/91	\$1,000
Lucile Brodhead	05/14/91	\$1,000
Jesse M. Brooks, Dr.	05/07/91	\$1,000
William E. Cooper	05/09/91	\$1,000
Natalie Duncan	05/14/91	\$1,000
Roy Guffey	05/07/91	\$1,000
Roy Guffy, Mrs.	05/09/91	\$1,000
Lyda H. Hill	05/14/91	\$1,000
H. L. Hunt, Mrs.	05/14/91	\$1,000
Nancy Ann Hunt	05/09/91	\$1,000
Ray L. Hunt	05/10/91	\$1,000
Gordon R. Johnson	05/10/91	\$1,000
Robert E. Johnson, Jr.	05/10/91	\$1,000
H. Ward Lay	05/09/91	\$1,000
M. Thomas Lardner	05/14/91	\$1,000
Charles Henry Lincoln	05/10/91	\$1,000
Thomas J./Carolyn G. Marquez	05/14/91	\$1,000
William Nathan	05/14/91	\$1,000
William D. Oates	05/09/91	\$1,000
Peter O'Donnell, Jr.	05/15/91	\$1,000
R. H. Pickens	05/08/91	\$1,000
Jas W. Porter	05/14/91	\$1,000

1. On July 3, 1991, in response to RAD's inquiry, the Committee submitted copies of the 48-Hour Notices that should have been filed. There are a few discrepancies between the information contained in that submission and the Committee's 1991 30 Day Post-Runoff Report. There is a discrepancy in the spelling of the surname "Guffy"; the contribution from Thomas J./Carolyn G. Marquez is reported as being from Thomas Marquez on the Committee's 48-Hour Notice; and the contribution from Bob B. Roberts is reported as being from Caroline Roberts on the 48-Hour Notice. Finally, there is a discrepancy in the date that the contribution from Texas Power & Light Empac was received by the Committee.

Ralph F. Rashbaum	05/09/91	\$1,000
Bob B. Roberts	05/14/91	\$1,000
Allan N. Shulkin	05/15/91	\$1,000
C. Dan Smith	05/09/91	\$1,000
Merrie Spaeth	05/07/91	\$1,000
Henry Stuart	05/09/91	\$1,000
Marcia Stuart	05/09/91	\$1,000
Charles T. Terrell	05/08/91	\$1,000
A. M. Wiederkehr	05/14/91	\$1,000
Arco PAC	05/14/91	\$1,000
Dealers Election Action Com.	05/14/91	\$1,000
Cent. Reg. Dow Chemical Empac	05/14/91	\$1,000
McDonald's PAC	05/07/91	\$1,000
NL Industries, Inc. PAC	05/14/91	\$3,000
Texas Power & Light Empac	05/07/91	\$2,000

Therefore, there is reason to believe that the Friends of Sam Johnson and Lyndon Bozeman, as treasurer, violated 2 U.S.C. § 434(a)(6) by failing to file 48-Hour notices of campaign contributions in excess of \$1,000 received after the 20th day, but more than 48 hours before the Special Run-Off Election, within 48 hours of receipt of the contributions.

S. Leon Bennett
13 Manor Lane
Lucas, Texas 75002

91 NOV 18 AM 10:20

November 12, 1991

Ms. Joan D. Aikens
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3433
Friends of Sam Johnson

Dear Ms. Aikens:

In accordance with my telephone conversation with Ms. Veronica Gillespie of Wednesday, November 6, 1991, I am making this response for the following purposes:

1. Upon Mr. Bozeman's receipt of your letter of October 23, 1991, he faxed me a copy of the letter; this was Monday, November 4, 1991. Although this response is beyond 15 days of the date of the October 23, letter, it is within 15 days of its receipt and Ms. Gillespie said that this response will be considered timely.
2. I have obtained the original "Statement of Designation of Counsel" included in the October 23, letter from Mr. Bozeman. It has been completed and forwarded to Congressman Johnson for execution. His office will deliver it to the Commission, directed to your attention.
- 3.

91 NOV 18 PM 3:34

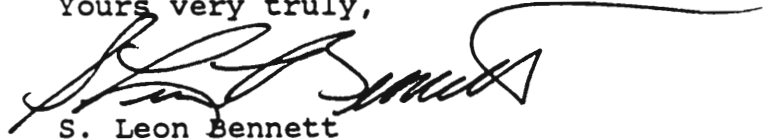
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FEDERAL ELECTION COMMISSION
NOV 11 1991

Ms. Joan D. Aike
November 12, 1991
Page 2

4.

I look forward to resolving this matter with the Commission through the Conciliation Agreement process and hope to hear from you in the near future.

Yours very truly,

A handwritten signature in dark ink, appearing to be "S. Leon Bennett", with a long, sweeping horizontal line extending to the right.

S. Leon Bennett

ccs: Congressman Sam Johnson
Mr. Lyndon Bozeman
Ms. Veronica M. Gillespie

FIRST NATIONAL BANK OF PARK CITIES

1001 10th St. Park City, UT 84060
P.O. BOX 4000 DALLAS TEXAS 75205

1385

THOMAS J. OR CAROLYN G. MARQUEZ

5526 DELOACHE 369 4726
DALLAS, TEXAS 75220

PAY
TO THE
ORDER OF

Friends of Sam Johnson
One thousand and no/100

May 12 19*91*

\$ 1,000.⁰⁰

DOLLARS

Thomas J. Marquez

YES! Count on me to help elect our next Congressman. I will:

- ☐ Lend my name to campaign endorsements ☐ Host an event for Sam
☐ Serve on the Finance Committee ☐ Put a yard sign in my yard
☐ Enclose my contribution for: ☒ \$1000 ☐ \$500 ☐ \$250 ☐ \$100 ☐ Other _____

Sam Johnson
★ U.S. CONGRESS ★

Contributions are limited by the Federal Election Laws to \$1,000 per person, \$2,000 per couple, and \$5,000 per multi-candidate PAC.

(over, please)

5-3 1977

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code or any applicable collection agreement.

83-123/119

CURRENCY

COIN

CHECKS

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714

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TOTAL FROM OTHER SIDE

2820 00

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7876160

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL



**Piano
Bank
& Trust**

W 15th at Alma Rd
Box 869111
Plano, Texas 75086-9111
214 422-5000

FRIENDS OF SAM JOHNSON
P.O. BOX 797866
DALLAS, TEXAS 75379-7866

008 FBI 5-00-918057

\$2,820.00 0

1: 1 1 1 90 1 2341: 1107 2946 711



CHECKS (LIST SINGLE)			DOLLARS	CENTS
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3	FEKUS ST. WEFHNFIC		25	00
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5	FEKUS ST. WEFHNFIC		25	00
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38	FEKUS ST. WEFHNFIC		25	00
39	FEKUS ST. WEFHNFIC		25	00
40	FEKUS ST. WEFHNFIC		25	00
41	FEKUS ST. WEFHNFIC		25	00
42	FEKUS ST. WEFHNFIC		25	00
TOTAL			28	00

ENTER THE TOTAL ON THE FRONT OF THIS TICKET

TEXAS UTILITIES ELECTRIC CO.
TEXAS POWER & LIGHT DIVISION
EMPLOYEE POLITICAL ACTION COMMITTEE
P. O. BOX 660268 DALLAS, TX 75268-0268

4-26 19__91

Sam Johnson

\$ 2000.00

Two Thousand Dollars and no/100----- DOLLARS



1401 Elm Street
Dallas, Texas 75283

FOR '91 special election

11 000903 11 01 11 100001 21 11 07 5753 4 11

Harold Greely
Thomas D. Brown



A COMMITMENT TO SERVICE

Sam,

Sorry that I miss
you. I hope this
check will help and
good luck Saturday. We
have found to be very
useful in Washington. The



ACCEPTED FOR PUBLICATION

Soma

Sorry that I miss
you I hope this
check will help and
good luck Saturday. We
look forward to having
you in Washington. Ike

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3433

NAME OF COUNSEL: S. Leon Bennett

ADDRESS: 13 Manor Lane
Lucas, Texas 75002

TELEPHONE: (214) 692-3233

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FEDERAL ELECTION COMMISSION
91 NOV 13 PM 5:27

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

November 13, 1991
Date

Sam Johnson
Signature

RESPONDENT'S NAME: Sam Johnson

ADDRESS: 1223 Longworth
H.O.B.
Washington, D.C. 20515

HOME PHONE: (703) 418-0214

BUSINESS PHONE: (202) 225-4201

District of Columbia:

Subscribed and sworn before me this 13th day of November 1991.

*James Andrew Bantz
Notary Public
my commission expires 8/31/96*

86C 3933

13 Manor Lane
Lucas, TX 75002
(214) 727-8645
(214) 692-3233

December 23, 1991

Ms. Veronica M. Gillespie
Federal Election Commission
Office of the General Counsel
999 E Street N.W.
Washington, D.C. 20463

Re: MUR 3433

Dear Ms. Gillespie:

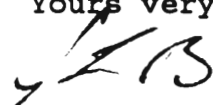
Enclosed are duplicate originals of the Conciliation Agreement, 1 which I have executed, together with the Committee's check for \$3,000.

In accordance with our conversation, it is my understanding that this Agreement contemplates the reporting requirements of 2 U.S.C. Section 434(a)(6), 2 U.S.C. Section 434 (a)(9) and the Notice requirements contained in the Communication of the Commission dated April 4, 1991 directed to Texas Special Congressional Committees.

I have enjoyed working with you on this matter, and I appreciate your cooperation and patience.

With Best Wishes for Happy Holidays, I am

Yours very truly,



S. Leon Bennett

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 30 PM 12:46

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 DEC 24 AM 10:11

1277

FRIENDS OF SAM JOHNSON, NO. 2

P.O. BOX 797866
DALLAS, TEXAS 75379-7866

88-123/1119

12-21 1991

PAY
TO THE
ORDER OF

FEC

\$30.00⁰⁰Three thousand and no/100
MUR 3433

DOLLARS

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

Lyndon J. Boggs

⑈001277⑈ ⑆111901234⑆ ⑈07 2994 7⑈

W 1400 at Allen Rd.
Box 809111
Plano, Texas 75088-9111
214 422-5000Plano
Bank
& Trust

RECEIVED
F.E.C.
SECRET

BEFORE THE FEDERAL ELECTION COMMISSION 4:41

In the Matter of

Friends of Sam Johnson
Lyndon Bozeman, as treasurer

)
)
) **SENSITIVE**
) MUR 3433
)
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by S. Leon Bennett, attorney of record for the Friends of Sam Johnson ("the Committee") and its treasurer, Lyndon Bozeman ("Respondents"). Attachment 1.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Friends of Sam Johnson and Lyndon Bozeman, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

1/7/92
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Proposed conciliation agreement
2. Photocopy of civil penalty check

Staff Assigned: Veronica M. Gillespie



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DONNA ROACH *DR*
COMMISSION SECRETARY

DATE: JANUARY 10, 1992

SUBJECT: MUR 3433 - GENERAL COUNSEL'S REPORT
DATED JANUARY 7, 1992.

The above-captioned document was circulated to the
Commission on WEDNESDAY, JANUARY 8, 1992 at 11:00 a.m.

Objection(s) have been received from the
Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Potter	<u>XXX</u>
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for TUESDAY, JANUARY 28, 1992.

Please notify us who will represent your Division before
the Commission on this matter.

In the Matter of)
) MUR 3433
Friends of Sam Johnson;)
Lyndon Bozeman, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on January 28, 1992, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3433:

1. Accept the conciliation agreement with the Friends of Sam Johnson and Lyndon Bozeman, as treasurer, as recommended in the General Counsel's report dated January 7, 1992.
2. Close the file.
3. Approve the appropriate letter as recommended in the General Counsel's report dated January 7, 1992.

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

Attest:

Jan. 30, 1992
Date

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

February 6, 1992

CLOSED

Mr. S. Leon Bennett
13 Manor Lane
Lucas, Texas 75002

RE: MUR 3433
Friends of Sam Johnson
and Lyndon Bozeman, as
treasurer

Dear Mr. Bennett:

On January 28, 1992, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 434(a)(6), 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 your clients.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script, reading "Veronica M. Gillespie", is written over the typed name.

Veronica M. Gillespie
Attorney

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Friends of Sam Johnson
Lyndon Bozeman, as treasurer

)
)
) MUR 3433
)
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Friends of Sam Johnson and Lyndon Bozeman, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(6).

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

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

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

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

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

1. Friends of Sam Johnson is a political committee within the meaning of 2 U.S.C. § 431(4), and is the authorized principal campaign committee for Samuel Robert Johnson's 1991 congressional campaign.

2. Lyndon Bozeman is the treasurer of the Friends of Sam Johnson.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, and the Secretary of State, as appropriate, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. Id. The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

4. Pursuant to 2 U.S.C. § 434(a)(6)(A), Respondents were required to file notices for all contributions of \$1,000 or more received from May 5, 1991 through May 15, 1991, within 48 hours of receipt.

5. The Respondents received forty (40) contributions of \$1,000 or more totaling \$43,000 between May 7, 1991 and May 15, 1991 in connection with the May 18, 1991 Special Run-Off Election in the State of Texas.

6. The Respondents did not submit 48 Hour Notices for these contributions as required under 2 U.S.C. § 434(a)(6).

V. The Respondents failed to report campaign contributions in excess of \$1,000 received after the 20th day, but more than 48 hours before the Special Run-Off Election, within 48 hours of receipt of the contributions in violation of 2 U.S.C. § 434(a)(6).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of three thousand dollars (\$3,000), 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 30 days from the date this agreement becomes effective to comply with and implement

the requirement 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 enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

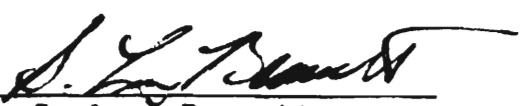
BY:


Lois G. Lerner
Associate General Counsel

Date

2-6-92

FOR THE RESPONDENTS:


S. Leon Bennett
Attorney for Respondents

December 20, 1991
Date



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3403

DATE FILMED 3/13/92 CAMERA NO. 3

CAMERAMAN TMH