



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Date: 10/13/94

☒ Microfilm
☐ Public Records
☐ Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED MUR 3963

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RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

Oct 11 3 20 PM '94 October 7, 1994

Oct 11 10 41 AM '94

Mary Taksar
Attorney
Control Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

mup 3963

Dear Mary:

Reference the enclosed letter you sent me concerning the complaint I filed. Since this matter becomes public record in 30 days, please send me a complete copy.

Thank you,

Edward Dyck

4043590962



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 12, 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: 3963

Dear Mr. Dyck:

This letter is in regard to your letter dated October 7, 1994, which I received on October 11, 1994. Your letter requests a copy of the file in MUR 3963. I have forwarded your request to the Public Disclosure Division, the appropriate division to handle a request for a copy of the file once it has been placed on the public record. Please contact the Public Disclosure Division at 1-800-424-9530 regarding your request.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

4043590963



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3963

DATE FILMED 10-25-94 CAMERA NO. 4

CAMERAMAN Jm H

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COUNSEL

May 5, 1994

MAY 11 2 36 PM '94

MUR 3963

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COMMISSION
ADMINISTRATIVE

MAY 11 8 52 AM '94

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

Office of General Counsel
The Federal Election Commission
999 E. Street N.W.
Washington, D.C. 20463

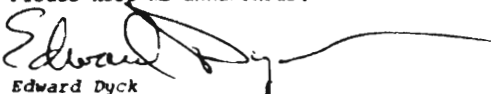
Subject: Complaint against The Perot Petition Committee aka Perot '92
(7616 LBJ Freeway, Ste 727, Dallas, TX 75251) for Prohibited
Corporate Contributions (in-kind contributions from The Perot
Group Corporation) which is in direct violation of 2 U.S.C.
441b of 11 CFR.

Dear Sir:

The Federal Law prohibits corporate contributions in connection with
Federal Elections. During the period of March 1992 to November 1992, The
Perot Petition Committee and Perot '92 were provided the services of the
below listed individuals from the Perot Group and/or Perot Systems (Corporations)
without charge while they were on the payroll of these corporations:

- 24043591304
- | | |
|---|--|
| 1. J. Russ Monroe
The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251 | Home address
7132 Blackwood Drive
Dallas, TX 75231 |
| 2. Mike and Mary Poss
The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251 | also
Treasurer
Perot '92
7616 LBJ Freeway, Ste. 727
Dallas, TX 75251 |
| 3. Mark Blahnik
Joe Grant
Michelle Grant
Ralph Perkins
The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251 | |
| 4. Russ Melbye
The Perot Group
1700 Lakeside
12377 Merit Drive
Dallas, TX 75251 | Home address
3852 Dalston Lane
Plano, TX 75023 |

Supporting documentation is enclosed. J. Russ Monroe admitted that he
was being paid by the Perot Group to us at a meeting in April 1992. In addition,
Mr. Larry Way of 1734 Marker Rd., Middleton, MD 21769 (tele 301-371-6858) has
further positive proof that clearly states that these individuals were paid
by corporations and at no cost to the Perot Petition Committee aka Perot '92.
Please keep me anonymous.


Edward Dyck

NOTED PL. STATE, MAY 11, 1994
County of Jefferson, No. 107, 1994
My Commission Expires August 20, 1994

Subscribed and sworn before me on this _____ day of May 1994.

Perot Hired Private Investigators To Check Campaign Volunteers

BY STEVEN A. HOLMES
Executive Editor of the New York Times

DALLAS, Sept. 29 — Ross Perot, whose original candidacy for the Presidency was based on accusations that he had hired private investigators to investigate private investigators, hired a California private investigator to conduct investigations of some of the volunteers in his campaign.

An official with the Perot campaign acknowledged today that the Dallas investigator paid more than \$24,000 in August and September to the Callahan & Gibbons Group, a San Francisco company that does private investigations.

Clayton Mottet, general counsel for the Perot campaign, said that most of the money was paid to the private security firm to provide guards at a number of campaign offices of the Perot campaign. Mr. Mottet said some of the money was used to investigate campaign workers who had misappropriated funds or had criminal records.

There were constant complaints from volunteers about this person doing this, this person doing that, this person stealing money. Mr. Mottet said, "We didn't know what to believe. Our people, in certain isolated instances, would have Callahan & Gibbons run checks."

Mr. Mottet added, "This was not

done as a matter of course on volunteers; it was done as a result of requests by volunteers or accusations by volunteers that were forwarded to the Perot campaign about misappropriation of funds or criminal records."

The use of private investigators to run checks on business and political records was raised several times during Mr. Perot's original campaign through the spring. For example, a report in The Washington Post, quoted by Mr. Perot, said he had once hired detectives to check into a land transaction conducted by President Bush's partner in the oil business. Other reports said

Continued on Page A19, Column 2

Ross Perot

Private Investigators Were Hired to Check Up on Perot Volunteers

By Steven A. Holmes
Executive Editor of the New York Times

Mr. Perot's campaign had hired private investigators to check up on its own volunteers, it was learned today. The Perot campaign had hired the Callahan & Gibbons Group, a San Francisco company that does private investigations, to check up on its volunteers.

On Tuesday, Sept. 29, a press conference in Washington, Mr. Perot said he had employed private investigators only to solve questions about those who were accused that an employee of his campaign or another campaign might be stealing money. He said the charges against them were the result of a number of complaints made by the Perot campaign.

There was no indication of investigation being done in this, a group of men in a large crowd gathered in the campaign office, Mr. Perot said at the time.

There was no evidence that the Callahan & Gibbons Group or any other part of the Perot campaign was involved in any threats against campaign workers. Though the Callahan & Gibbons Group is not a law firm, Mr. Perot's August filing with the Federal Election Commission lists more than



Incorrect:
Blahnik was
Still an employee
of The Perot Group

"legal fees." Mr. Mottet said that this was the result of a clerical error and an amended disclosure form would be filed with the F.E.C.

In recent days, several former campaign volunteers have complained of being the target of investigations. Tom

Blahnik, a former Perot volunteer, said he was accused of stealing money from the campaign. He said he was accused of stealing money from the campaign. He said he was accused of stealing money from the campaign.

Mr. Mottet said that the Perot campaign was also used to investigate a report that an Illinois resident was planning to start a new Perot campaign in the electoral college. He said the report was that a convicted felon, who might not be eligible to vote, Mr. Mottet said the matter was not to be a legal conviction. Blahnik had charged to vote.

The Callahan & Gibbons Group was founded in the business in California this past April. One of its principals was John Gibbons, who spent 17 years in the California State Prison for a federal conviction. He is an expert in federal counter espionage.

94043591305

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

November 29, 1993

Mike Poss
The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

Dear Mr. Poss,

I was a volunteer for the Missouri for Perot Petition Committee from March to May 1992.

Reference the Fair Credit Reporting Act, did you have any knowledge of the investigation of myself by The Perot Petition Committee, 6606 LBJ Freeway, Dallas, TX, on or around April-May 1992?

If so, what was the purpose of the investigation, and what information was provided to the organization about me?

Sincerely,

Edward Dyck

Is your RETURN ADDRESS completed on the reverse side?

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. ☐ Addressee's Address 2. ☐ Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mike Poss The Perot Group 1700 Lakeside Square 12377 Merit Dr. Dallas, TX 75251		4a. Article Number	
4b. Service Type ☐ Registered ☐ Certified ☒ Express Mail		☐ Insured ☐ COD ☐ Return Receipt for Merchandise	
5. Signature (Addressee) <i>Mike Poss</i>		7. Date of Delivery 12-3	
6. Signature (Sender) <i>Edward Dyck</i>		8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

PS Form 3811, December 1

Perot '92
7616 LBJ Freeway, Suite 727
Dallas, Texas 75251

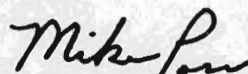
December 11, 1993

Mr. Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

Dear Mr. Dyck:

I received your letter of November 29, 1993. I have no knowledge of a background investigation by the Perot Petition Committee.

Sincerely,



Mike Poss
Treasurer

MP/bvp

24043591307

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

December 6, 1993

Russ Monroe
The Perot Group
1700 Lake Side Square
12377 Merit Drive
Dallas, TX 75151

Dear Mr. Monroe:

I was a volunteer for the Missouri for Perot Petition Committee from March to May 1992 to get Mr. Perot on the ballot in Missouri.

Reference the Fair Credit Reporting Act, did you have any knowledge of the investigation of myself by The Perot Petition Committee, 6606 LBJ Freeway, Dallas, TX, on or about April-May 1992?

If so, what was the purpose of the investigation, and what information was provided to the organization about me?

Sincerely,

Ed Dyck

34043591308

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to: *The Perot Group*

Russ Monroe
12377 Merit Drive
Dallas, TX 75151

4a. Article Number
P057 062 732

4b. Service Type

☐ Registered	☐ Insured
☒ Certified	☐ COD
☐ Express Mail	☐ Return Receipt for Merchandise

7. Date of Delivery
12-10-93

8. Addressee's Address (Only if requested and fee is paid)

9. Signature (Addressee)
Russ Monroe

10. Signature (Agent)

11. POSTNET barcode

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

J. Russ Monroe
7132 Blackwood Drive
Dallas, Texas 75231

December 13, 1993

Mr. Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

Dear Mr. Dyck:

I received your letter of December 6, 1993. I have no knowledge of a background investigation by the Perot Petition Committee.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Russ Monroe", written in dark ink.

J. Russ Monroe

24043591309

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

November 4, 1993

Mark Blahnik
Director of Security
The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

Dear Mr. Blahnik:

I was a volunteer for the Missouri for Perot Petition Committee from March to May 1992.

Reference the Fair Credit Reporting Act, did you have any knowledge of the investigation of myself by The Perot Petition Committee, 6606 LBJ Freeway, Dallas, TX?

If so, what was the purpose of the investigation, and what information was provided you on myself?

Sincerely,

Edward Dyck

4043591310

Is your RETURN ADDRESS completed on the reverse side?

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. ☐ Addressee's Address 2. ☐ Restricted Delivery. Consult postmaster for fee.	
3. Article Addressed to: MARK Blahnik Director of Security The Perot Group 1700 Lakeside Square 12377 Merit Drive Dallas, TX 75251		4a. Article Number 319231664	
5. Signature (Addressee) [Signature]		4b. Service Type ☒ Registered ☐ Insured ☒ Certified ☒ COD ☐ Express Mail ☐ Return Receipt for Merchandise	
6. Signature (Agent) [Signature]		7. Date of Delivery 11/8	
		8. Addressee's Address (Only if requested and fee is paid) 111	

Thank you for using Return Receipt Service.

ABC NEWS

47 West 64th Street, New York, NY 10023

Transcripts: Journal Graphics, Inc., 1535 Grant Street, Denver, CO 80203

Press Contact: Laura Wesner (212) 456-4995

August 13, 1992
Transcript #2929

NIGHTLINE

President Perot: What Went Wrong? Part I

In Washington

TED KOPPEL Host

TOM BETTAG Executive Producer

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An electronic index of transcripts is available on the CompuServe Information Service.

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President Perot: What Went Wrong? Part I

TED KOPPEL: *[voice-over]* He made 20 million Americans believe that they counted. He set out to get noticed, and he did. To shake up the system, and he did.

H. ROSS PEROT: It's time to pick up a shovel and go clean out the barn.

KOPPEL: *[voice-over]* To be President, and he might have been.

Mr. PEROT: I'm ready to climb in the ring as long as you're there with me.

KOPPEL: *[voice-over]* Tonight, part one of a special investigation, the campaign that transformed an election year, and perhaps politics, for a long time to come. "President Perot: What Went Wrong?"

ANNOUNCER: This is an ABC News Nightline investigation. Reporting from Washington, Ted Koppel.

KOPPEL: I talked to Ross Perot about appearing on this broadcast, told him what we were hoping to do, that we were trying to get a handle on his campaign, on why so many people hold so many different views on what happened and why, and what ultimately caused him to quit. "There's not one chance in a thousand," said Mr. Perot, "That you'll get it right. But you go do whatever you want to do." Bottom line: the man who knows the most about what he did and why doesn't want to talk about it, not now, anyway. That is no small handicap.

Indeed, no profile of the Perot campaign will ever be complete until the man at the center of it all shares his recollections of what happened. Only he knows what made him get into it and what made him get out of it. But even without Perot, there is a wealth of material out there: television ads that never ran, an official video biography that was never shown, the volunteers, for whom the campaign was almost a religious experience and their culture clash with the white shirts, the lieutenants, the soldiers. That's what the volunteers called the disciplined young businessmen from Dallas from Perot Systems, who, without any political experience, were sent out to organize the campaign. And finally, of course, the political pros that were brought in to make the gigantic, chaotic enterprise work, but who were shunted to the sidelines almost from the time they were hired.

SAL RUSSO, Political Consultant: I don't believe that Ross Perot, when he went on the *Larry King* show, had any idea that this was going to happen. I don't think he intended to be a presidential candidate.

Mr. PEROT: *["Larry King Live," CNN, February 20, 1992]* Now recognize, you listen to the guy, doesn't want to do this. But if you, the people, will, on your own—

Mr. RUSSO: I think he was as surprised as everybody else was, that millions of Americans went to the— took to the streets to get him signatures.

Mr. PEROT: *["Larry King Live," CNN, February 20, 1992]* And I don't want some apparatus belt, I don't want two or three guys with big money around trying to do it.

NORMA WAGNER, Volunteer: Never, never— never involved in any form of politics ever in my life. Then I saw him on *Larry King*. And my husband and I both made a comment then, if this man truly runs, then we will vote for him.

KOPPEL: *[voice-over]* But was Perot truly running? On one level, if you listen carefully, he was merely promising to shake up the establishment.

Mr. PEROT: *["Larry King Live," CNN, February 20, 1992]* If you

want to register me in 50 states, number one: I'll promise you this, between now and the convention, we'll get both parties heads straight. Number two: I think I can promise you're going to see a world-class candidate on each side. And number three: by the convention, you might say *[unintelligible]*, "It's all taken care of."

KOPPEL: *[voice-over]* What everyone focused on, though, was what came next.

Mr. PEROT: *["Larry King Live," CNN, February 20, 1992]* On the other hand, we're set. And if you're not happy with what you see and you want me to do it, then I don't want any money from anybody but you. And I don't want anything but five bucks from you, because I can certainly pay for my own campaign, no ifs, ands and buts. But I want you to have skin in the game, I want you to be in the ring.

ROSE ROBERTS-CANNADAY, Director, Phone Bank: As soon as he got off the *Larry King* show, that network phone line went into gridlock. And then, by the next day, people had gotten Mr. Perot's phone number in Dallas to his Perot Systems, and his business totally shut down. They couldn't get a call out or in because there were so many phone calls.

VOLUNTEER: Perot Petition Committee, how many I help you?

Ms. ROBERTS-CANNADAY: So he had no choice but to create almost instantly a little mini phone bank that had about 20 phones.

KOPPEL: *[voice-over]* Among those who volunteered to man the phone bank: Norma Wagner.

Ms. WAGNER: A lady had called in and she was trying to get the telephone number. And so, it turned out that they gave her the Perot Board instead of Perot Petition because people didn't know the name Perot then.

KOPPEL: *[voice-over]* That would change over the course of the next few weeks.

PHIL DONAHUE: Look out George Bush, here comes H. Ross Perot, right here.

KOPPEL: *[voice-over]* Ross Perot sought and got free television time. Programs were as eager to have him on as he was to get the exposure. Perot, in March, was the political flavor of the month.

Mr. PEROT: *[1st Program]* Step one, you have to do something that's very unusual in Washington, that is, you have to analyze the problem.

[2nd Program] Well, I'll do what I say I will do.

[3rd Program] —in World War II would envy the propaganda machine we have around the White House.

Ms. WAGNER: If Ross were on some television program, it was— we would be absolutely inundated with telephone calls. You can't imagine how many— I mean, you'd look down, that light was call waiting constantly.

KOPPEL: *[voice-over]* The Dallas phone bank was closed to the press most of the time. But this video was shot by a volunteer, Howard Mann, a lingerie salesman, who became the self-appointed campaign videographer.

HOWARD MANN, Volunteer: There was a speed, it was a fanatic vibration. I mean, people were calling in every minute. We had thousands of calls a minute. And then we picked up an 800 number with the Home Shopping Network. I think they lent us something like 1,000 phones, and they were gridlocked. I mean, so the pace was totally chaotic.

FRANK LUNTZ, Political Consultant: And to see them come in each day with a different Perot button and a different Perot hat. It looked like a convention. We had a convention in our headquarters every single day that people came in to work on the phone banks. And it really was wonderful.

Mr. MANN: Excitement. Total excitement. We have this man in the White House already. We have this man as our President. We have this— He was walking on water, as far as I was concerned.

KOPPEL: It was all building, the calls, the volunteers, the petition drives, working to get Perot on the ballot, from New York to California. But even the most spontaneous of campaigns eventually requires some organization. And behind the scenes, Ross Perot, a man with a passion for tight control, found himself riding a movement that was growing out of control. Even a campaign dedicated to politics as never before needed a structure. But who would run it, and how? That part of the Perot campaign when we come back.

(Commercial break)

KOPPEL: On the surface, things looked fine. Better than fine. What was evolving under the Perot for President banner was nothing short of a political miracle: millions of people declaring themselves for a man they scarcely knew but instinctively trusted. Petitions were being signed. State requirements to get Perot's name on the ballot were being met. But who was running the campaign? The volunteers, after all, were flying by the seat of their pants; nothing quite like this had ever been done before. Mike Ruppert was a volunteer trying to organize the campaign in California.

MICHAEL RUPPERT, LA County Press Secretary: It was absolute chaos. We were building the airplane as we were flying it through the air. And, unless you've been in a grass roots campaign with this kind of intensity, it's almost impossible to describe the grind, the overwhelming demand and stimulus that's placed upon you 24 hours a day. That could, perhaps, have been overcome some with some better structure, with some better leadership.

Mr. RUSSO: As in any campaign like this that was really self-generated by the people themselves, you know, there was a share of charlatans and scam artists. And we had a couple— at least one, I can remember, convicted felon. And so, these people had to kind of get weeded out of the organization.

KOPPEL: Back in Dallas, Perot recognized the need for imposing some control. But he was reluctant to turn things over to political professionals. That would have been politics as usual. He turned, instead, to some of the young men who worked in his company, Perot Systems. They would become liaison between Dallas and people like Matthew Leflander, who was Chairman of New York's People for Perot.

MATTHEW LEFLANDER: We used to jokingly refer to them as the lieutenants or the soldiers because a number of these people were recruited from the military. And, in some cases, they came in and treated our volunteers as though they were employees or subordinates. They weren't, they were volunteers.

Ms. WAGNER: I started getting some calls. I remember getting it from Oklahoma, that was the first one. And I didn't know how to handle it.

Mr. MANN: They sort of pushed their way in front of the volunteers. And we were getting calls constantly. A lot of feelings were hurt.

Ms. WAGNER: Their complaint was that this guy came in and he was—it was almost Gestapo tactics.

Mr. LEFLANDER: There was a Dallas-bred contempt and distrust of the volunteers. They wanted to micro-manage them and manipulate them.

PHIL RIERDAN, Volunteer: On the day that we had set up for Perot to come here to Massachusetts on the Boston Common, big rally, a day or so before, his troops come in. His troops are, you know, young guys, white shirts, humorless, and wanted to take over. And, of course, our feelings were, you know, "Where the hell were you when the piece of paper was

blank? And you're not taking over." So they get up on the stage and started taking our people off the stage, people who had worked to get him signatures for months and months, and then they're putting up people we had never seen before, which made us a little unhappy. I shouldn't say that, it made us very unhappy.

KOPPEL: Jim Squires, an old newspaper hand, who joined Perot in Dallas, to help handle press matters, concedes that there was a culture clash.

JIM SQUIRES, Media Advisor: Those problems were problems of incompetence, not Nazi attitudes. They didn't know what to do. These are really young people who had not been around politics.

Mr. RUPPERT: If this was a bottoms-up movement, what we had was some serious blockage around the navel and the throat, and that seemed to be getting in the way of us getting information to Ross Perot.

KOPPEL: (voice-over) But the public Perot phenomenon overshadowed any of the discontent that was broiling beneath the surface. By the end of April, Perot was clearly a serious contender for the presidency. The paradox was that the grass roots movement had been so successful that it had grown beyond its own capacity to handle itself. And as for the candidate, Perot had graduated from being a quaint object of bemused curiosity. This was a man who could topple an incumbent president. Such men earn a different kind of attention. White House spokesman Marlin Fitzwater said Perot was, "A dangerous and destructive personality. People may soon ask, what kind of a monster are we buying here?"

Mr. SQUIRES: The whole idea of Inspector Perot, someone who— who goes around looking at people's private lives and who hires private detectives and who has a pension for prying into the personal matters of other people and then using that in some— to some advantage down the road. That was the very first question raised about Perot's character, and— and in my view, one of the really unfair mischaracterizations of the man, because I don't think that's what he's about at all.

KOPPEL: (voice-over) Again, on the surface, at least, there was no impact. The public didn't know how disorganized the campaign was and didn't seem affected by the unfavorable stories about Perot.

Perot's rallies were enthusiastic. Between May 12th and 23rd, Perot's name was placed on the ballot in Delaware, Maine, Kentucky and Wyoming. May 27th, Florida and Perot's home state of Texas put him on the ballot. But organizationally, behind the scenes, the campaign was floundering. Those inside the campaign didn't know who was running the show.

GINNY FITZGERALD: Well, that was kind of the \$64,000 question, actually.

KOPPEL: (voice-over) Ginny Fitzgerald was hired around the end of May to help organize events in the field.

INTERVIEWER: Your direct boss was?

Ms. FITZGERALD: I don't know.

INTERVIEWER: Staff meetings every day?

Ms. FITZGERALD: No.

INTERVIEWER: Regular briefings?

Ms. FITZGERALD: No.

INTERVIEWER: What was the organization?

Ms. FITZGERALD: Well, we get back to that \$64,000 question.

KOPPEL: It was in that context and around that time, the end of May, that Perot's two closest aids, Tom Luce and Mort Meyerson, began looking for help, professional help, the very kind of people that Ross Perot had publicly said had no place in his campaign.

When we come back, Perot and the pros.

(Commercial break)

KOPPEL: It is difficult, if not impossible, to remain a political virgin for long when you're running for President of the United States. But Ross Perot had this dilemma: the more successful his grass roots campaign became, the higher his ranking in the polls, the more states in which his name appeared on the ballot, the more desperately he needed professional help. But his distaste for political pros was no sham. He didn't like or trust them.

Mr. PEROT: [May 29, 1992] Political pros still don't know what hit them. If you don't have the stomach for it, then let's not try it. But if

we don't do it, we're not going to leave our children the kind of country our parents left us. It's that simple.

KOPPEL: But what the men closest to Perot: Meyerson, Luce and Squires, had come to realize was that if this campaign was to be more than just a magnificent gesture, if Perot really intended to win, he needed professional advice. Perot's top aides had begun meeting quietly with Ed Rollins, who helped Ronald Reagan win the White House, and Hamilton Jordan, who had done the same for Jimmy Carter.

HAMILTON JORDAN, Campaign Co-Chairman: I went into the meeting, my first meeting with Ross, with a positive feeling about it and left, you know, very impressed with him. He's a dynamic guy. He's a salesman. He was selling himself that day. And Ed and I were both selling ourselves.

ED ROLLINS, Campaign Co-Chairman: We then ran him through what a campaign was. Hamilton put together some charts and laid out strategies and messages and what a campaign would be all about. And we really described to him, in gory detail, of how tough this was going to be.

Mr. JORDAN: But I don't think it's possible for anyone in advance to understand what it's like to go through the process of running for President.

TOM LUCE, Campaign Chairman: It's my pleasure today, as chairman of—

Mr. ROLLINS: We made the decision in the next 48 hours, went down on Wednesday, announced it, and— and we were off.

Mr. LUCE: As you heard Ross Perot perhaps say before, when you are getting ready to play in the NFL, you need somebody who has played before. And that's Ed Rollins and Hamilton Jordan.

Mr. RIERDAN: The initial reaction of everyone on the local level was a disappointment, because this man had just stood up, about maybe six weeks before, and said, "I'm not going to have handlers within a mile of me." And now he's got two of the greatest handlers in the business. But, you know, looking on the bright side, we say, "Well, maybe they'll finally get their act together. Maybe we'll have some direction coming out of it. There will be budgets, we'll have things of that nature."

Mr. SQUIRES: We hired these two guys and we had a press conference and we got a big hit and we gave them big titles. But in fact, we didn't give them any authority to run the campaign at all. They had titles. But the decisions in the campaign were going to be made by Ross Perot and the people around Ross Perot.

Mr. PEROT: All the political professionals said that just good, decent people at the grass roots level could not organize themselves.

Mr. JORDAN: Perot had his own style, his own technique, his own way of doing things, and I knew that we had to respect that. Having said that, there were still certain things that we had to do. We had to get on television, we had to schedule the campaign, we had to utilize this enormous volunteer army that was out there. And therein was the rub.

Mr. SQUIRES: From the very first day, it was clear that Perot was going to continue to deal directly with his field operation and that the

campaign managers weren't going to run it.

Mr. ROLLINS: It was a petition drive. It really wasn't a campaign. And there really wasn't any structure in place to make it into a campaign.

Ms. ROBERTS-CANNADAY: I don't think Rollins really ever understood the grass roots movement.

Mr. RUSSO: We did rely on the volunteers. We had sometimes silly results, like, for example, in Hartford, there was a beautiful backdrop of the Capitol coming out of the trees. But the podium was set so that Mr. Perot, as he spoke, could see the beautiful scene. And when somebody asked the volunteers, "Why didn't you have that as the backdrop, let the television cameras capture the Capitol in the trees and Mr. Perot standing in front of them all?" And the answer was, "We wanted Mr. Perot to be able to see this beautiful view when he was speaking." People across America that were turning on the television set saw a relatively ugly backdrop.

Mr. ROLLINS: I've had campaigns where I didn't know what a candidate was going to say. I've never had a campaign where I didn't know where this candidate was. I mean, he literally would be, on any given day, any place. When I first arrived in the camp band, I said, "Well, I need a copy of the schedule." And they said, "That's a top-secret document." I said, "Wait a minute." I said, "I'm the campaign manager. You're telling me I can't know where he is or what he's already agreed to do?"

NEWSCASTER: ("Today") We are joined, as noted, by Ross Perot, who, if you believe most polls, will be a very formidable candidate for President.

Mr. ROLLINS: In the case of the last *Today* show appearance, calls us from the airplane, is on his way to New York to do the show.

Mr. SQUIRES: We never got to a professional scheduling operation because Perot wanted to schedule himself.

Mr. JORDAN: There was something kind of charming about him doing these things himself. Now, you know, the political hacks will argue that you can't do that. But that was part of his appeal, that was part of his magic.

Mr. SQUIRES: And Perot thinks that candidates ought to think for themselves, leaders ought to speak for themselves, leaders ought to decide where they go. Those decisions shouldn't be made for them by other people.

Mr. ROLLINS: He didn't like the idea of, quote, "the handlers." And I tried to explain to him one time, I said, "Rosa," I said, "It's like Madonna concert. You know, Madonna is the star. She goes on, she picks the songs she wants to sing. But she doesn't worry about how she gets there, she doesn't worry about the staging, she doesn't worry about the lights, she doesn't worry about the sound system, she doesn't sell the tickets. I mean, she just her role is going on and singing the songs that she likes, which is like saying the speeches that you want. But the logistical part of it is— what this game is all about. And he just— He did not want to allow that to happen."

KOPPEL: Rollins thought he was Perot's campaign manager. He pulled together a \$150-million budget to include sophisticated polling, a direct-mail campaign, television ads from the man who produced Ronald Reagan's Morning in America campaign. None of it saw the light of day.

Tomorrow night, we'll tell you what happened. And we'll show you the TV commercials and the video biography that never made air. In a moment, a closing thought of a fallen friend.

[Commercial break]

KOPPEL: Most of the major religions recommend that we fast, abstain

from food and drink, periodically, to remind us, among other things, of the involuntary suffering of those who have nothing. That, in a sense, is how it was today for those of us here at ABC News, when our old friend and colleague, Dave Kaplan, was shot and killed in Sarajevo. People have been dying in Bosnia every day for months now. We report it, regret it in a perfunctory sort of way, and go on with our lives. We have not felt the pain of losing one of our own, until today.

That's our report for tonight. I'm Ted Koppel in Washington. For all of us here at ABC News, goodnight.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MAY 23, 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: MUR 3963

Dear Mr. Dyck:

This letter acknowledges the receipt on May 11, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3963. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

24043591316



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MAY 23, 1994

Mark Kinney, Registered Agent
Hillwood Development Corporation
D/B/A The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

RE: MUR 3963

Dear Mr. Kinney:

The Federal Election Commission received a complaint which indicates that The Perot Group may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3963. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against The Perot Group in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

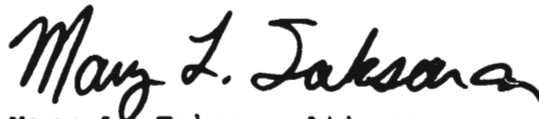
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

24043591317

Mark Kinney, Registered Agent
The Perot Group
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

24043591318



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

MAY 23, 1994

Prentice-Hall Corporation System, Registered Agent
Perot Systems
400 North Saint Paul Street
Dallas, TX 75201

RE: MUR 3963

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that Perot Systems may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3963. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Perot Systems in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

94043591319

Prentice-Hall Corporation System, Registered Agent
Perot Systems
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

24043591320



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MAY 23, 1994

Mike Poss, Treasurer
Perot '92
12377 Merit Drive, Suite 1700
Dallas, TX 75251

RE: MUR 3963

Dear Mr. Poss:

The Federal Election Commission received a complaint which indicates that Perot '92 ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3963. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

24043591321

Mike Poss, Treasurer
Perot '92
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

24043591322

OGC# 1545

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

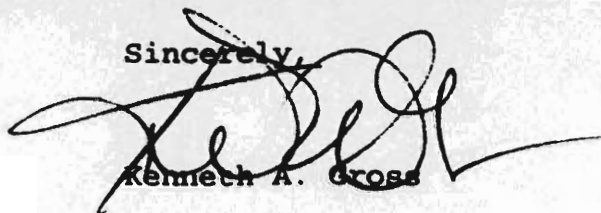
Re: MUR 3963 Hillwood Development
Corporation

Dear Ms. McEnery:

Enclosed please find a Designation of Counsel
for the above referenced entity.

I will be in touch with you regarding this
matter.

Sincerely,


Kenneth A. Cross

Enclosure

24043591323

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3963

NAME OF COUNSEL: Kenneth A. Gross

ADDRESS: Skadden, Arps, Slate, Meagher & Flom

1440 New York Avenue, Northwest

Washington, D.C. 20005

TELEPHONE: (202) 371-7007

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.

5/26/94
Date

Mark Kinney
Signature

RESPONDENT'S NAME: Mark Kinney

ADDRESS: 12377 Merit Drive, Suite 1700

Dallas, Texas 75251

TELEPHONE: HOME (214) 343-8344

BUSINESS (214) 788-3028

24043591324

SKADDEN, ARPS, SLATE, MEAGHER & FLOM

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June 1, 1994

VIA FAX & FIRST CLASS MAIL

Joan McEnery, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

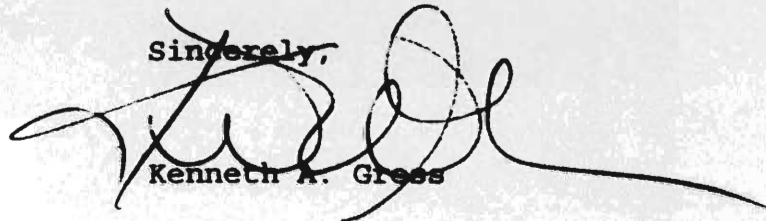
Re: MUR 3963 Perot '92

Dear Ms. McEnery:

Enclosed please find a Designation of Counsel
for the above referenced entity.

I will be in touch with you regarding this
matter.

Sincerely,



Kenneth A. Gress

Enclosure

34043591325

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3963

NAME OF COUNSEL: Kenneth A. Gross

ADDRESS: Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, Northwest
Washington, D.C. 20005

TELEPHONE: (202) 371-7007

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.

5/25/94
Date

Mike Poss
Signature

RESPONDENT'S NAME: Mike Poss

ADDRESS: 12377 Merit Drive, Suite 1700
Dallas, Texas 75251

TELEPHONE: HOME (214) 826-0779

BUSINESS (214) 788-3030

24043591326

SKADDEN, ARPS, SLATE, MEAGHER & FLOM

1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2111

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FAX: (202) 393-5760

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June 10, 1994

VIA FAX & FIRST CLASS MAIL

Joan McEnery, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

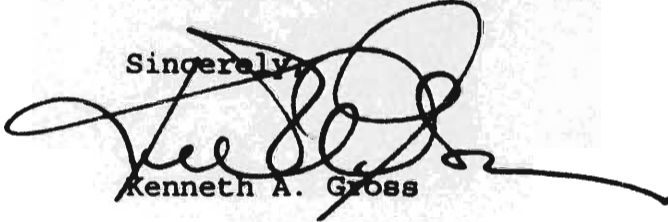
Re: MUR 3963 Perot Systems Corporation

Dear Ms. McEnery:

Enclosed please find a Designation of Counsel for the above referenced entity. As we discussed, I am requesting a ten day extension of time to prepare the necessary documents demonstrating that a violation did not occur.

Thank you for your consideration of this request.

Sincerely,


Kenneth A. Gross

Enclosure

24043591327

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3963

NAME OF COUNSEL: Kenneth A. Cross, Esq.

ADDRESS: Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, Northwest
Washington, D.C. 20005

TELEPHONE: (202) 371-7007

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.

5/31/97
Date

Peter Otchek
Signature Asst. Secretary, Perot
Systems Corporation

RESPONDENT'S NAME: Perot Systems Corporation

ADDRESS: 12377 Merit Drive, Suite 1100
Dallas Tx 75251

TELEPHONE: HOME()

BUSINESS(214) 383-5855

24043591328



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JUNE 16, 1994

Kenneth A. Gross, Esq.
Skadden, Arps, Slate,
Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111

RE: MUR 3963
Perot Systems Corporation

Dear Mr. Gross:

This is in response to your letter dated June 10, 1994, requesting a ten day extension to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on June 27, 1994.

If you have any questions, please contact Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

24043591329

SKADDEN, ARPS, SLATE, MEAGHER & FLOM

1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107

(202) 371-7000

FAX: (202) 383-5760

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June 27, 1994

VIA HAND DELIVERY

Joan McEnery, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: MUR 3963 - Perot '92 and Mike Poss,
as Treasurer, Perot Systems Corpora-
tion, and Hillwood Development Corpo-
ration

Dear Ms. McEnery:

This letter is submitted in response to the complaint filed by Edward Dyck alleging that Perot '92 received corporate in-kind contributions by accepting services from eight employees of the Perot Group. No action should be taken against Respondents because the allegations contained in the complaint are unfounded, both factually and legally. Only three of the alleged eight Perot Group employees were actually employed by the Perot Group while the other five were exclusively employed by Perot '92 or a temporary help agency which Perot '92 paid as a vendor of the campaign. Furthermore, the three employees of the Perot Group were compensated solely by the Perot Group which is an unincorporated sole proprietorship owned and funded by Ross Perot and created for the purpose of managing Mr. Perot's personal affairs. The Perot Group's funds are Mr. Perot's personal funds. Therefore, no corporate funds were used to pay those three Perot Group employees, but rather, Ross Perot's personal funds which finance the Perot Group were used and properly reported.

24043591330

Joan McEnery, Esq.
June 27, 1994
Page 2

The complaint alleges that Perot '92 received corporate in-kind contributions during the period of March 1992 to November 1992 by accepting services from eight employees of the Perot Group. Those eight alleged Perot Group employees are Russ Melbye, Ralph Perkins, Mary Poss, Joe Grant, Michelle Grant, Mark Blahnik, Mike Poss, and J. Russ Monroe.

Five of the eight alleged Perot Group employees were paid or paid for by Perot '92 and were not employed by the Perot Group during the period at issue. As sworn to in their affidavits, Russ Melbye and Mary Poss were exclusively employed by Perot '92. See Attachment 1. They received compensation directly from Perot '92 and no other source. Furthermore, during the period at issue, Joe Grant and Michelle Grant were either exclusively employed by a temporary help agency which was paid by Perot '92 for their temporary services or directly employed by Perot '92. See Attachment 2 (A fax copy of Michelle Grant's affidavit is attached. The original will be forthcoming). Ralph Perkins was also employed by Perot '92 on a full time basis during the period at issue and was not employed by the Perot Group. Perot '92 properly reported compensation disbursed to the five Perot '92 employees named above. See Attachment 3.

Mark Blahnik, Mike Poss, and J. Russ Monroe were employed by the Perot Group during the period at issue. See Attachment 4. As sworn to by the General Counsel of Perot '92, no corporate funds were used to compensate those three Perot Group employees.¹ See At-

¹ Although Hillwood Development Corporation ("Hillwood") and Perot Systems Corporation ("Perot Systems") have been made respondents in this MUR, Hillwood and Perot Systems have no relevance to this case. Hillwood is a separate and distinct entity from the Perot Group and is merely licensed to use the Perot Group name in certain of its business activities. Furthermore, during the period at issue, neither Hillwood nor Perot Systems employed or compensated any of the persons
(continued...)

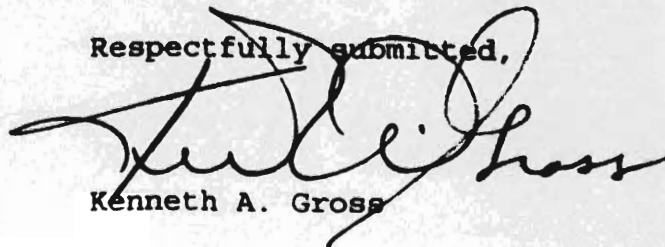
Joan McEnery, Esq.
June 27, 1994
Page 3

tachment 5. The three Perot Group employees named in the complaint were compensated exclusively by the Perot Group and no other source. See Attachments 4 and 5. Mr. Perot's personal funds, which finance the Perot Group, were used to compensate those three employees, and their services were properly reported to the Federal Election Commission ("FEC") as in-kind contributions from Mr. Perot. See Attachment 3.

None of the persons named in the complaint were employed or compensated by a corporation. Five of the named persons were paid or paid for by Perot '92 and the other three were paid from Mr. Perot's personal funds. The only contribution that occurred was an in-kind contribution from Mr. Perot to his own committee which was properly reported.

The Commission has no basis to proceed on the unfounded allegations contained in the complaint and should dismiss the complaint against all respondents forthwith.

Respectfully submitted,



Kenneth A. Gross

Attachments

¹(...continued)

specified in the complaint as having provided services to Perot '92.

24043591332

ATTACHMENT 1

24043591333

AFFIDAVIT

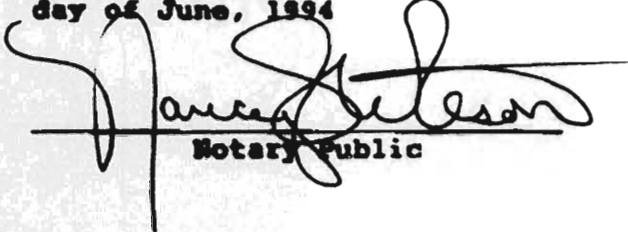
Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

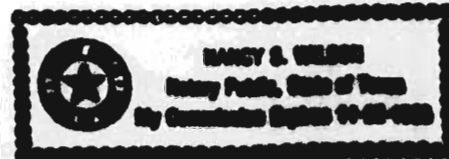
I, RUSS NELBYE, being duly sworn, depose and say:

1. During the period between April 1992 and December 1992, I worked for the Perot Petition Committee/Perot '92.
2. During the time period described above, I was employed exclusively by Perot '92 and did not receive salaried compensation from any other source.


RUSS NELBYE

Sworn to before me this 22ND
day of June, 1994


Notary Public



24043591334

AFFIDAVIT OF MARY POSS

Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

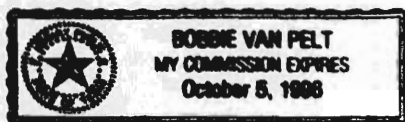
I, MARY POSS, being duly sworn, depose and say:

1. During the period between May, 1992 and July, 1992, I worked for Perot '92.
2. The only time that I provided services to Perot '92 was during the period described above when I was exclusively employed by Perot '92 and did not receive compensation from any other source.

Mary Poss
MARY POSS

Sworn to before me this 21
day of June, 1994.

Bobbie Van Pelt
Notary Public



24043591335

ATTACHMENT 2

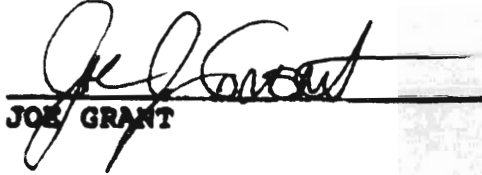
24043591336

AFFIDAVIT OF JOE GRANT

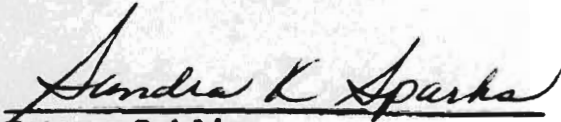
Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

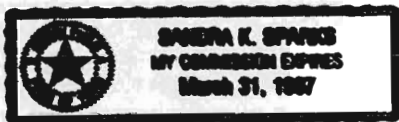
I, JOE GRANT, being duly sworn, depose and say:

1. From late March until early July 1992, I was exclusively employed by a temporary agency. I was assigned by my employer, First Word Temporaries, to work at the Perot Petition Committee. The Perot Petition Committee paid the temporary agency to obtain my services.
2. I was hired by the Perot Petition Committee in early July, 1992, and remained a full time employee of the campaign committee until election day. (The name of the campaign committee changed to "Perot '92" in October 1992.)


JOE GRANT

Sworn to before me this 5th
day of June, 1994


Notary Public



AFFIDAVIT OF MICHELLE GRANT

Re: MUR 1963 - Perot '92 and Mike Poss, as Treasurer

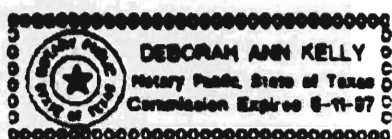
I, MICHELLE GRANT, being duly sworn, depose and say:

1. From late March until early July 1992, I was exclusively employed by a temporary agency. I was assigned by my employer, First Word Temporaries, to work at the Perot Petition Committee. The Perot Petition Committee paid the temporary agency to obtain my services.
2. I was hired by the Perot Petition Committee in early July 1992 as a full time employee, a position I held until the end of July 1992. After July 1992 I was neither employed nor provided services to the Perot Petition Committee.

Michelle Grant
MICHELLE GRANT

Sworn to before me this 21
day of June, 1994

Debra A. Kelly
Notary Public



ATTACHMENT 3

24043591339

Section 2
Operating Disbursements

Disbursements

Page 10 of 10
For Line Number 10

Name of Committee (in Full)
Presidential Committee 000003340

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Maffie McDaniel 4104 Park Ln. Dallas, TX 75220-	rent Disbursement for (X)General	04/29/92	\$231.90
Leonard McDaniel Rt 1 Box 234 Circleville, MO 64416-	(X) supplies Disbursement for (X)General	04/29/92	\$294.46 IP-6120
Leonard McDaniel Rt 1 Box 234 Circleville, MO 64416-	(X) supplies Disbursement for (X)General	04/29/92	\$115.83 IP-6120
C S McDermott 2333 Sosa Street Hempstead, TX 75040-	contract labor Disbursement for (X)General	04/29/92	\$240.00
C S McDermott 2333 Sosa Street Hempstead, TX 75040-	contract labor Disbursement for (X)General	04/29/92	\$700.00
Rene Hallye 2000 Sumpst Ln Piano, TX 75060-	air travel; parking; food Disbursement for (X)General	04/29/92	\$1700.36
Rene Hallye 2000 Sumpst Ln Piano, TX 75060-	payroll Disbursement for (X)General	04/29/92	\$1100.00
SUBTOTAL of Disbursements This Page.....>			\$4336.44
TOTAL This Period.....>			

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SCHEDULE B
Operating Expenditures
FINISHED DISBURSEMENTS
PAGE 71 OF
FOR LINE NUMBER 23
NAME OF COMMITTEE(In Full)
Perot Petition Committee C00263148

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

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Russ Melbye 2509 Bengal Ln Plano, TX 75023-	payroll	04/15/92	\$758.57
	Disbursement for (X)General		
Metropolitan Answer1 13500 Midway Rd Ste 208 Dallas, TX 75244-	telephone expenses	04/08/92	\$1970.15
	Disbursement for (X)General		
C D Moyers RD 1 Box 272-A Hampton, NJ 08827-	supplies	04/30/92	\$385.20
	Disbursement for (X)General		IN-KIND
C D Moyers RD 1 Box 272-A Hampton, NJ 08827-	travel	04/30/92	\$125.00
	Disbursement for (X)General		IN-KIND
C D Moyers RD 1 Box 272-A Hampton, NJ 08827-	telephone expenses	04/30/92	\$21.76
	Disbursement for (X)General		IN-KIND
Miller Business Syst PO Box 848181 Dallas, TX 75284-0181	office supplies	04/15/92	\$964.69
	Disbursement for (X)General		
Miller Business Syst PO Box 848181 Dallas, TX 75284-0181	office supplies	04/15/92	\$7084.20
	Disbursement for (X)General		
SUBTOTAL of Disbursements This Page.....>			\$11409.57
TOTAL This Period.....>			

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SUMMARY B
Operating Expenditures

PEROT SYSTEMS CORPORATION

PAGE 02 OF 02
PUR LINE NUMBER 33

NAME OF COMMITTEE(In Full)
Perot Petition Committee 000243145

Any information copied from such figures 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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/YY	Amount
Oxford Printing 3203 Maple Drive Atlanta, GA 30305-	Printing Disbursement for (X)General	04/22/92	\$430.09
Pacific Bell 370 3rd St Rm 516 San Francisco, CA 94107-	Installation Disbursement for (X)General	04/29/92	\$1710.29
Nike Parise 320 Conny Island Drive Sparks, NV 89431-	promotional materials Disbursement for (X)General	04/02/92	\$350.00 IN-KIND
Bob Peck 1016 San Jacinto #1437 Irving, TX 75063-	travel; parking; lodging Disbursement for (X)General	04/08/92	\$477.00
Ralph W Perkins 2355 Riverland #3 Sterling Heights, MI 48314-	travel; lodging; telephone Disbursement for (X)General	04/13/92	\$2336.33
Perot Investments In 12377 Marik Dr #1700 Dallas, TX 75251-	payroll Disbursement for (X)General	04/29/92	\$5000.00
Perot Systems Corp 5001 Spring Valley Rd Suite #1 Dallas, TX 75244-	payroll Disbursement for (X)General	04/01/92	\$25000.00
SUBTOTAL of Disbursements This Page.....>			\$35803.79
TOTAL This Period.....>			

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Section 2
Operating Expenditures
DISBURSEMENTS
PAGE 149 OF 151
PAGE 149 OF 151
NAME OF CONTRIBUTOR (in Full)
Parot Petition Committee C00263145

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Ralph Perkins 400 Shokis Blvd Northbrook, IL 60062-	reimbursement - travel Disbursement for (X)General	06/18/92	\$4000.00
Ralph Perkins 8388 Riverland Apt #3 Sterling Heights, MI 48314-	Travel Reimbursement Disbursement for (X)General	06/12/92	\$1031.24
Ralph Perkins 20000 Squinadro Warren, MI 48093-	Disbursement for (X)General	06/14/92	\$3027.90
Ralph Perkins 20000 Squinadro Warren, MI 48093-	Travel Expenses Disbursement for (X)General	06/15/92	\$3449.05
FORUMS PROMOTIONS	PROMOTIONAL MATERIALS Disbursement for (X)General	06/20/92	\$85.00
FORUMS PROMOTIONS Instant Poo Place P.O. Box 30 Arlington, TX 76010-	Promotional Materials Disbursement for (X)General	06/04/92	\$457.90
FORUMS PROMOTIONS Instant Poo Place P.O. Box 30 Arlington, TX 76010-	Wire Transfer for buttons Disbursement for (X)General	06/27/92	\$4000.00
SUBTOTAL of Disbursements This Page.....>			\$17220.49
TOTAL This Period.....>			

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SECTION 2
Operating Expenditures
FINANCIAL STATEMENTS

 PAGE 106 OF 221
 FOR LINE NUMBER 33

NAME OF CONTRIBUTOR (in Full)
 Forest Petition Committee C00263145

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Portland Conference 1030 N.E. 3rd Ave, Suite 100 Portland, OR 97232-	Room Rental for Rally	03/06/92	\$1670.00
	Disbursement for (X)General		
Portland Conference 1030 N.E. 3rd Ave, Suite 100 Portland, OR 97232-	Campaign materials	03/06/92	\$3700.00
	Disbursement for (X)General		
Portland Conference 1030 N.E. 3rd Ave, Suite 100 Portland, OR 97232-	Rent	03/06/92	\$911.50
	Disbursement for (X)General		IN-KIND
Mary Foss 6400 Mercedes Dallas, TX 75214-	Payroll	03/29/92	\$1003.00
	Disbursement for (X)General		
Post Office	Postage	03/01/92	\$225.00
Matthews, MO 20100-	Disbursement for (X)General		
Postage by Phone P.O. Box 7900071 St. Louis, MO 63179-0071	Postage	03/20/92	\$000.00
	Disbursement for (X)General		
Postage by Phone P.O. Box 7900071 St. Louis, MO 63179-0071	Postage	03/04/92	\$000.00
	Disbursement for (X)General		
SUBTOTAL of Disbursements This Page.....>			\$9795.45
TOTAL This Period.....>			

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COMMITTEE'S
Operating Expenditures
FINANCIAL STATEMENTS
PAGE 128 OF 221
FOR LINE NUMBER 23
NAME OF CONTRIBUTOR (in Full)
Perot Petition Committee C00263146

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Robert Hulead PO Box 84308 Dallas, TX 75284-0332	Contract Labor Disbursement for (X)General	06/11/92	\$115.00
Head Data Control In 9365 Springhouse Pike PO Box 93 Dayton, OH 45404-9904	Research Expenses Disbursement for (X)General	06/20/92	\$3000.00
W Hare Dallas, TX	Contract Labor Disbursement for (X)General	06/24/92	\$240.00
Washington Blvd o Charlotte, NC 28204-	Meeting Expense Disbursement for (X)General	06/16/92	\$500.00
Washington Blvd o Charlotte, NC 28204-	Meeting Expense Disbursement for (X)General	06/04/92	\$4125.00
National City Dallas PO Box 90000 Dallas, TX 75202-	Meeting Expense Disbursement for (X)General	06/14/92	\$1000.00
Russ Halygo 2500 Bengal Lane Plano, TX 75023-	Payroll Disbursement for (X)General	06/15/92	\$1200.00
SUBTOTAL of Disbursements This Page.....>			\$21941.10
TOTAL This Period.....>			

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CONTRACT 2
Operating Signatures

TRANSMISSION DOCUMENTS

PAGE 129 OF 221
FOR LINE NUMBER 13

NAME OF COMMITTEE(In Full)
Parot Petition Committee C00263149

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Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Ross Melbye 2509 Bengal Lane Plano, TX 75023-	Payroll	08/29/92	\$1103.00
	Disbursement for (X)General		
Ross Melbye 2509 Bengal Lane Plano, TX 75023-	Reimbursement Travel	08/07/92	\$2968.78
	Disbursement for (X)General		
Neen Copy & Print 2633 Harbor Blvd. Costa Mesa, CA 92626-	Printing	08/12/92	\$232.01
	Disbursement for (X)General		
Message Answer Resp Co PO Box 718 North Haven, CT 06473-	Phone Bank	08/11/92	\$879.14
	Disbursement for (X)General		
Message Cam USA 24022 Larkin Road North Olmsted, OH 44070-	Paging and message service	08/27/92	\$393.00
	Disbursement for (X)General		
Donna Haggins 160 S. Rindge Dr. #100 Beverly Hills, CA 90212-	Computer	08/04/92	\$600.00
	Disbursement for (X)General		
Nete Media Paging PO Box 8308 Philadelphia, PA 19101-0308	Telephone Expense	08/11/92	\$4146.67
	Disbursement for (X)General		
SUBTOTAL of Disbursements This Page.....>			\$10119.45
TOTAL This Period.....>			

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FORMS 2
Operating Expenditures
ISSUANCE STATEMENTS
PAGE 117 OF 121
FOR LINE NUMBER 15
NAME OF CONTRIBUTOR (in Full)
Forest Petition Committee 000043145

Any information copied from cash 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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Eric Grafstrom 5555 AMESBURY #103 DALLAS, TX 75206	payroll Disbursement for (X)General	07/31/92	\$1076.97
JAY H. GRANT P.O. BOX 190697 SAN FRANCISCO, CA 94119	reimbursement -- travel Disbursement for (X)General	07/03/92	\$913.96
JAY H. GRANT P.O. BOX 190697 SAN FRANCISCO, CA 94119	payroll Disbursement for (X)General	07/18/92	\$990.72
JAY H. GRANT P.O. BOX 190697 SAN FRANCISCO, CA 94119	reimbursement -- travel Disbursement for (X)General	07/18/92	\$1473.00
JAY H. GRANT P.O. BOX 190697 SAN FRANCISCO, CA 94119	payroll Disbursement for (X)General	07/31/92	\$990.72
Joe Grant 1802 Angelina Dr Garland, TX 75040-	payroll Disbursement for (X)General	07/18/92	\$765.00
Joe Grant 1802 Angelina Dr Garland, TX 75040-	payroll Disbursement for (X)General	07/31/92	\$990.24
Nichelle L Grant 1802 Angelina Dr Garland, TX 75040-	payroll Disbursement for (X)General	07/18/92	\$765.00
Nichelle L Grant 1802 Angelina Dr Garland, TX 75040-	payroll Disbursement for (X)General	07/31/92	\$2037.49
SUBTOTAL of Disbursements This Page.....>			\$10802.49
TOTAL This Period.....>			

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SCHEDULE B
Operating Expenditures
PAGE 30 OF
FOR LINE NUMBER 23
NAME OF COMMITTEE (in Full)
 Perot '92 C00263145

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Barbara Gradisher 2008 Ohio Avenue Cuyahoga Falls, OH 44223	Cell-Phone Expense Disbursement for (X)General	12/18/92	\$436.45 IN-KIND
Eric Grafstrom 3555 Ameshury #102 Dallas, TX 75205	payroll Disbursement for (X)General	11/30/92	\$2153.96
Charles Graham P.O. Box 877 Camden, ME 04843	Cell-Phone & Copy Expenses Disbursement for (X)General	12/31/92	\$361.55 IN-KIND
Jay Grant PO Box 190497 San Francisco, CA 94119	payroll Disbursement for (X)General	11/30/92	\$990.72
Jay Grant PO Box 190497 San Francisco, CA 94119	payroll Disbursement for (X)General	11/30/92	\$1901.46
Joe Grant 1802 Angelina Drive Garland, TX 75040	payroll Disbursement for (X)General	11/30/92	\$1010.74
Joe Grant 1802 Angelina Drive Garland, TX 75040	payroll Disbursement for (X)General	11/30/92	\$2037.49
Joe Grant 1802 Angelina Drive Garland, TX 75040	payroll Disbursement for (X)General	12/15/92	\$1010.74
Great Lakes Trophy 1555 Plainfield NE Grand Rapids, MI 49505	MI-Promotional Materials Disbursement for (X)General	12/11/92	\$2892.28
SUBTOTAL of Disbursements This Page.....>			\$12891.39
TOTAL This Period.....>			

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SCHEDULE 3
Operating Expenditures
ITEMIZED DISBURSEMENTS

 PAGE 118 OF 120
 FOR LINE NUMBER 23

NAME OF COMMITTEE (in Full)

Perot Petition Committee C00263145

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Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Michelle L Grant 1802 Angelina Dr Garland, TX 75040-	payroll Disbursement for (X)General	07/31/92	\$1018.74
Graphco	Event Expense Disbursement for (X)General	07/09/92	\$720.00
Graphco Enterprises 5812-W Mooretown Road Williamsburg, VA 23188	Promotional Materials Disbursement for (X)General	07/16/92	\$462.72
Graphic Dimensions PO Box 88354 Albuquerque, NM 87198-	Promotional Materials Disbursement for (X)General	07/02/92	\$435.52
Graphic Engraving PO Box 918 Columbia, MO 65208-	Event Expense Disbursement for (X)General	07/30/92	\$241.70
Graphics Unlimited 2211 N Main Roswell, NM 88201-	Promotional Materials Disbursement for (X)General	07/20/92	\$2945.80
Russell Graves Rt. 2, Box 2520 Quitman, TX 75783	Contract Labor Disbursement for (X)General	07/09/92	\$480.00
Russell Graves Rt. 2, Box 2520 Quitman, TX 75783	Contract Labor Disbursement for (X)General	07/24/92	\$720.00
Gray & Creech Office 8024 Raleigh Durham Raleigh, NC 27612-	Equipment Rent Disbursement for (X)General	07/14/92	\$614.00
SUBTOTAL of Disbursements This Page.....>			\$7638.48
TOTAL This Period.....>			

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CONTRACT 2

DISBURSEMENTS

Page 1 of 1
Feb 2000 Number 25

Operating Expenses

NAME OF COMMITTEE (in Full)

Forest Protection Committee C00063148

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Ross Halbye 3062 Salston Lane Plano, TX 75023	TRAVEL REIMBURSEMENT	7/12 08/14/92	\$2568.63
	Disbursement for (X)General		
Ross Halbye 3062 Salston Lane Plano, TX 75023	TRAVEL REIMBURSEMENT	7/28 08/14/92	\$721.04
	Disbursement for (X)General		
Ross Halbye 3062 Salston Lane Plano, TX 75023	payroll	08/15/92	\$1100.00
	Disbursement for (X)General		
Ross Halbye 3062 Salston Lane Plano, TX 75023	TRAVEL REIMBURSEMENT	7/28 08/21/92	\$2568.63
	Disbursement for (X)General		
Ross Halbye 3062 Salston Lane Plano, TX 75023	payroll	08/21/92	\$2568.63
	Disbursement for (X)General		
Horroville Bank PO Box 419147 Kansas City, MO 64141-	Bank Charge	08/11/92	\$38.41
	Disbursement for (X)General		
Horroville Bank PO Box 419147 Kansas City, MO 64141-	Bank Charge	08/15/92	\$38.41
	Disbursement for (X)General		
Antonia Huron 271 Bleecker St New York, NY 10014-	payroll	08/15/92	\$757.78
	Disbursement for (X)General		
Antonia Huron 271 Bleecker St New York, NY 10014-	payroll	08/31/92	\$757.78
	Disbursement for (X)General		
SUBTOTAL of Disbursements This Page.....>			\$9660.11
TOTAL This Period.....>			

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SECTION 2
Operating Expenditures
ITINERARY DISBURSEMENTS
Page 07 of 231
For 2000 Summary 23
NAME OF COMMITTEE (in Full)
Forst Petition Committee 000043148

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
JAY H GRANT P.O. BOX 190097 SAN FRANCISCO, CA 94119	payroll Disbursement for (X)General	08/18/92	9790.73
JAY H GRANT P.O. BOX 190097 SAN FRANCISCO, CA 94119	payroll Disbursement for (X)General	08/31/92	9790.73
Joe Grant 1000 Angeline Drive Garland, TX 75040	payroll Disbursement for (X)General	08/18/92	9790.34
Joe Grant 1000 Angeline Drive Garland, TX 75040	Insurance Disbursement for (X)General	08/17/92	000.00
Joe Grant 1000 Angeline Drive Garland, TX 75040	payroll Disbursement for (X)General	08/31/92	9790.34
Graphic Arts 5700 Crenshaw Los Angeles, CA 90008-	Printing Disbursement for (X)General	08/01/92	0000.75
Russell Groves Rt 2 Box 2830 Quitman, TX 75783	contract labor Disbursement for (X)General	08/01/92	0000.00
Russell Groves Rt 2 Box 2830 Quitman, TX 75783	contract labor Disbursement for (X)General	08/21/92	0000.00
C W Grayson 1940 Hidden Valley Rockwell, TX 75087	contract labor Disbursement for (X)General	08/01/92	0200.00
SUBTOTAL of Disbursements This Page.....>			9000.76
TOTAL This Period.....>			

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SCHEDULE B
Operating Expenses
FINANCIAL STATEMENTS
PAGE 130 OF 207
FOR LINE NUMBER 23
NAME OF COMMITTEE (in Full)
Forest '92 000263148

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Beth Ann Peradotti 1715 Calhoun Street Peru, IL 61354	promotional materials Disbursement for (X)General	09/18/92	\$1045.96 IN-KIND Footnote: 13
Francisco Perez 4917 Rounian Dr Plano, TX 75024-	Payroll Disbursement for (X)General	09/18/92	\$1166.01
Francisco Perez 4917 Rounian Dr Plano, TX 75024-	Payroll Disbursement for (X)General	09/30/92	\$1166.01
JAVIER PEREZ 4917 ROUNIAN DR. PLANO, TX 75024	reimbursement -- travel Disbursement for (X)General	09/25/92	\$2045.41
Maurice Perkins 6036 South Michigan Chicago, IL 60635-	Contract Labor Disbursement for (X)General	09/04/92	\$900.00
Ralph Perkins 8355 RIVERLAND #3 STERLING HEIGHTS, MI 48314	reimbursement -- travel Disbursement for (X)General	09/04/92	\$627.70
Ralph Perkins 8355 RIVERLAND #3 STERLING HEIGHTS, MI 48314	reimbursement -- travel Disbursement for (X)General	09/20/92	\$626.30
Ralph Perkins 8355 RIVERLAND #3 STERLING HEIGHTS, MI 48314	reimbursement -- travel Disbursement for (X)General	09/25/92	\$2001.32
Permanent Foundations 1419 Satchan Drive Arlington, TX 76010-	promotional materials Disbursement for (X)General	09/08/92	\$105.00
SUBTOTAL of Disbursements This Page.....>			\$19965.71
TOTAL This Period.....>			

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COMMITTEE 2
Operating Expenditures
Committee Contributions
Page 1 of 1
Page 1 of 1
NAME OF COMMITTEE (in Full)
Form '92 C00203100

Any information copied from such reports and statements may not be used 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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
W.S. Hears 4910 Pinchard Garland, TX 75043	security Disbursement for (X)General	09/15/92	\$400.00
Jeffrey E Hedealf 9707 Kingsley Rd #034 Dallas, TX 75230-	Payroll Disbursement for (X)General	09/15/92	\$1099.00
Jeffrey E Hedealf 9707 Kingsley Rd #034 Dallas, TX 75230-	Void Check Disbursement for (X)General	09/30/92	\$-1000.00
Medical Transportation Services Inc. P.O. Box 70000 Dallas, TX 75200-0000	medical expense Disbursement for (X)General	09/04/92	\$700.00
Chatter Haler Rt 3, Box 200 Jonestown, MD 20601	event expense Disbursement for (X)General	09/20/92	\$200.00
Paul Russell Hallygo 3000 Salston Ln Plano, TX 75023	payroll Disbursement for (X)General	09/15/92	\$2000.00
Paul Russell Hallygo 3000 Salston Ln Plano, TX 75023	payroll Disbursement for (X)General	09/05/92	\$1200.00
Russ Hallygo 3000 Salston Lane Plano, TX 75023	DISBURSEMENT -- TRAVEL Disbursement for (X)General	09/10/92	\$7000.00
Steve Heltzer 200 Rector Place #00 New York, NY 10000-	Rent Disbursement for (X)General	09/23/92	\$400.00
SUBTOTAL of Disbursements This Page.....>			\$11200.00
TOTAL This Period.....>			

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COMMITTEE A Operating Expenses

DISBURSEMENTS

PAGE 02 OF 003 FOR LINE NUMBER 23

NAME OF CONTRIBUTOR (in Full) Perot '92 00001100

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Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Jean Granette 29 East 52nd Street New York, NY 10022-	Contract Labor	09/14/92	\$207.22
	Disbursement for (X)General		
Grand Rapids Press South Hampshire Grand Rapids, MI	Media Placement	09/10/92	\$2100.67
	Disbursement for (X)General		
Martha Cranglist 601 College Rd Fairbanks, AK 99701-	Event Expense	09/01/92	\$236.01
	Disbursement for (X)General		IN-CASH
JAN E. GRANT P.O. BOX 100007 SAN FRANCISCO, CA 94110	Reimbursement -- Travel	09/00/92	\$1448.01
	Disbursement for (X)General		
JAN E. GRANT P.O. BOX 100007 SAN FRANCISCO, CA 94110	Reimbursement -- Travel	09/11/92	\$1000.20
	Disbursement for (X)General		
JAN E. GRANT P.O. BOX 100007 SAN FRANCISCO, CA 94110	Payroll	09/00/92	\$000.70
	Disbursement for (X)General		
JAN E. GRANT P.O. BOX 100007 SAN FRANCISCO, CA 94110	Reimbursement -- Travel	09/01/92	\$1000.20
	Disbursement for (X)General		
JAN E. GRANT P.O. BOX 100007 SAN FRANCISCO, CA 94110	Payroll	09/20/92	\$000.72
	Disbursement for (X)General		
Joe Grant 1002 Angelina Drive Garland, TX 75040	Payroll	09/15/92	\$1010.74
	Disbursement for (X)General		
SUBTOTAL of Disbursements This Page.....>			\$16206.56
TOTAL This Period.....>			

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SCHEDULE B
Operating Expenditures
FINANCIAL STATEMENTS
PAGE 70 OF 70
PAGE 2300 NUMBER 23
NAME OF COMMITTEE (in Full)
Perot '92 C00243148

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Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Joe Grant 1802 Angelina Drive Garland, TX 75040	Payroll Disbursement for (X)General	09/30/92	\$1018.74
Grapevine Produce 1300 E. Plumb Reno, NV 89502-	Event Expense Disbursement for (X)General	09/19/92	\$233.00
Russell Graves Rt. 2, Box 2520 Quitman, TX 75783	security Disbursement for (X)General	09/18/92	\$240.00
Russell Graves Rt. 2, Box 2520 Quitman, TX 75783	security Disbursement for (X)General	09/25/92	\$240.00
Grey & Gruesh P O Box 30900 Raleigh, NC 27622-	Equipment Rent Disbursement for (X)General	09/15/92	\$207.00
Greeter Dallas Office Equip. #1 Spring Valley Village Richardson, TX 75080	equipment rent Disbursement for (X)General	09/25/92	\$202.46
OMCO SALES INC P.O. BOX 4226 SPRINGFIELD, IL 62708	event expense Disbursement for (X)General	09/18/92	\$200.00
David Green P. O. Box 1161 West Valley, MD 21030	telephone expense Disbursement for (X)General	09/09/92	\$218.00 IN-KIND
Greenville Water System 204 S Main St Greenville, SC 29602-	Utilities Disbursement for (X)General	09/18/92	\$20.21
SUBTOTAL of Disbursements This Page.....>			\$2706.90
TOTAL This Period.....>			

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SCHEDULE B
Operating Expenditures
ITEMIZED DISBURSEMENTS

 PAGE 01 OF 93
 FOR LEND NUMBER 23

 NAME OF COMMITTEE(In Full)
 Perot '92 C00263145

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Media Marketing 7043 Fry Street Rooseville, NJ 08113	Office Supplies & Postage Disbursement for (X)General	10/06/92	\$207.50
Russ Melbye 1852 Dalton Lane Plano, TX 75023	reimbursement -- travel Disbursement for (X)General	10/02/92	\$5554.25
Adrienne Maltzer 3249 Earlimar Dr Los Angeles, CA 90064	Consulting Disbursement for (X)General	10/14/92	\$4000.00
Steve Maltzer 200 Rector Place #4U New York, NY 10009	reimbursement -- travel Disbursement for (X)General	10/02/92	\$302.96
Message Cam USA 24532 Lornia Rd. North Olmsted, OH 44070	telephone expense Disbursement for (X)General	10/09/92	\$25.00
Michael J. Penn Design 825 Western Avenue Pittsburgh, PA 15213	promotional materials Disbursement for (X)General	10/02/92	\$605.00
Michigan Bell P.O. Box 9030 Saginaw, MI 48663	telephone expense Disbursement for (X)General	10/02/92	\$147.72
Michigan Bell P.O. Box 9030 Saginaw, MI 48663	telephone expense Disbursement for (X)General	10/02/92	\$122.61
Micro Computer Rents P O Box 33388 Raleigh, NC 27636	EQUIPMENT RENT Disbursement for (X)General	10/12/92	\$310.00
SUBTOTAL of Disbursements This Page.....>			\$11157.47
TOTAL This Period.....>			

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SCHEDULE B
Operating Expenditures
FINANCED DISBURSEMENTS

 PAGE 17 OF **96**
 FOR LINE NUMBER 73

 NAME OF CONTRIBUTOR (in Full)
 Perot '92 C00263145

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Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
John A Palmer 2409 Chestaw Plano, TX 75093	security Disbursement for (X)General	10/09/92	\$240.00
Panaruna Coaches 6301 East 49th Ave. Denver, CO 80230	meeting expense Disbursement for (X)General	10/02/92	\$552.00
Paper Tree Stationer 1692 Arden Way Sacramento, CA 95815	Office Supplies Disbursement for (X)General	10/13/92	\$41.43
Parks & Recreation LITTLE ROCK, AR 72003	EVENT EXPENSE Disbursement for (X)General	10/13/92	\$900.00
Any Fundraising 1st Gibraltar Bank Dallas, TX	Promotional Materials Disbursement for (X)General	10/14/92	\$700.00
MARKER FUNDING 4436 S. HOUGHTON AVENUE CHICAGO, IL 60610	REIMBURSEMENT-TRAVEL Disbursement for (X)General	10/14/92	\$600.00
Ralph Perkins 8366 RIVERLAND RD STERLING HEIGHTS, MI 48314	reimbursement -- travel Disbursement for (X)General	10/02/92	\$1347.70
Permanet Productions PO Box 100330 Arlington, TX 76010	Promotional Materials Disbursement for (X)General	10/12/92	\$3000.00
Ronald A Pottie 6907 Rowdies Drive Dallas, TX 75231	security Disbursement for (X)General	10/09/92	\$800.00
SUBTOTAL of Disbursements This Page.....>			\$7510.43
TOTAL This Period.....>			

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SCHEDULE B
Operating Expenditures

ITEMIZED DISBURSEMENTS

PAGE 46 OF
FOR LINE NUMBER 23

NAME OF COMMITTEE (in Full)
Parot '92 C00263148

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

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
NCI Telecommunications	telephone expense	12/18/92	\$132.97
Phoenix, AZ 85072	Disbursement for (X)General		
NCI Telecommunications	telephone expense	12/18/92	\$8718.24
Attn: Tom Timko 12798 Merit Dr., Suite 500 Dallas, TX 75231	Disbursement for (X)General		
NCI Telecommunications	telephone expense	12/31/92	\$228415.11
Attn: Tom Timko 12798 Merit Dr., Suite 500 Dallas, TX 75231	Disbursement for (X)General		
NCI Telecommunications	telephone expense	12/18/92	\$702.08
P.O. Box 3108 Cedar Rapids, IA 52406	Disbursement for (X)General		
NCI Telecommunications	telephone expense	12/11/92	\$857.28
886 1st St. SWP1 Rochester, MN 55902	Disbursement for (X)General		
Jeffrey E Madocals	payroll	12/15/92	\$996.58
9707 Kingsley Rd #824 Dallas, TX 75238	Disbursement for (X)General		
Jeffrey E Madocals	payroll	12/31/92	\$996.58
9707 Kingsley Rd #824 Dallas, TX 75238	Disbursement for (X)General		
Ross Melbye	payroll	11/30/92	\$2207.62
2509 Bengal Ln Plano, TX 75023	Disbursement for (X)General		
Ross Melbye	payroll	11/30/92	\$1103.80
2509 Bengal Ln Plano, TX 75023	Disbursement for (X)General		
SUBTOTAL of Disbursements This Page.....>			\$243830.63
TOTAL This Period.....>			

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SCHEDULE B
Operating Expenditures
PAGE 47 OF
FOR LINE NUMBER 23
NAME OF COMMITTEE (in Full)
 Perot '92 C00263145

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Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Russ Melbye 3852 Dalston Lane Plano, TX 75023	AIR TRAVEL Disbursement for (X)General	12/01/92	\$1214.90
Russ Melbye 3852 Dalston Lane Plano, TX 75023	TRAVEL REIMBURSEMENT Disbursement for (X)General	12/01/92	\$330.91
Nelson Inc 1990 Westwood Blvd. Ste.100 Los Angeles, CA 90025	office supplies Disbursement for (X)General	12/11/92	\$363.17
Clyde Walton P.O. Box 729 Cross Plains, TX 76443	*Promotional Materials Disbursement for (X)General	12/31/92	\$4494.00 XB-KIND Footnote: 12
Ray Mayers C/O Yorkshire Shoe Repair 3453 Columbus, OH 43231	OH-Misc. Expense Reimburs Imperial Sq. Disbursement for (X)General	12/11/92	\$476.02 XB-KIND
Michigan Bell P.O. Box 5030 Saginaw, MI 48643	telephone expense Disbursement for (X)General	12/01/92	\$2.57
Michigan Bell P.O. Box 5030 Saginaw, MI 48643	telephone expense Disbursement for (X)General	12/11/92	\$1343.49
Miller Business Systems P.O. Box 840181 Dallas, TX 75284	office supplies Disbursement for (X)General	12/01/92	\$50.04
Miller Business Systems P.O. Box 840181 Dallas, TX 75284	office supplies Disbursement for (X)General	12/10/92	\$66.00
SUBTOTAL of Disbursements This Page.....>			\$8341.10
TOTAL This Period.....>			

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SCHEDULE B
Operating Expenditures
FINANCIAL DISBURSEMENTS
PAGE 14 OF
POL LINE NUMBER 23
NAME OF COMMITTEE (In Full)
Parot '92 C00263145

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Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Pacific Marketing & Events 1020 N. E. 3rd Avenue Portland, OR 97232	event expense Disbursement for (X)General	12/31/92	\$4082.57
Lisa Packard 911 Tillyberry Hill Bedford, NH 13760	information requested Disbursement for (X)General	12/09/92	\$290.25 IN-KIND
Parrot 2-Phone 163 Commercial St. Portland, ME 04101	OFFICE SUPPLIES Disbursement for (X)General	12/11/92	\$889.27
Brian Parrot 280 S.W. Stark Ave. 200 Portland, OR 97204	equipment sent Disbursement for (X)General	12/31/92	\$870.00
Richard Packard P.O. Box 17000 San Antonio, TX 78217	REIMBURSEMENT FOR TRAVEL Disbursement for (X)General	12/11/92	\$3882.87
JAVIER PEREZ 4917 Hamilton Dr. Plano, TX 75024	TRAVEL REIMBURSEMENT Disbursement for (X)General	12/01/92	\$872.79
Ralph Perkins 8388 RIVERLAND #3 STERLING HEIGHTS, MI 48314	TRAVEL REIMBURSEMENT Disbursement for (X)General	12/01/92	\$3822.92
Ralph Perkins 8388 RIVERLAND #3 STERLING HEIGHTS, MI 48314	TRAVEL REIMBURSEMENT Disbursement for (X)General	12/01/92	\$1889.47
Ralph Perkins 8388 RIVERLAND #3 STERLING HEIGHTS, MI 48314	TRAVEL REIMBURSEMENT Disbursement for (X)General	12/11/92	\$1291.99
SUBTOTAL of Disbursements This Page.....>			\$15222.43
TOTAL This Period.....>			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**
Operating Expenditures

 PAGE 123 OF **358**
 FOR LINE NUMBER 23

 NAME OF COMMITTEE (in Full)
 Perot '92 C00263145

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 used by any person for the purposes of soliciting contributions or for
 commercial purposes, other than using the name and address of any political
 committee to solicit contributions from such committee

Full Name Mailing Address	Purpose of Disbursement	Date	Amount
		MM/DD/YY	
RAY H. GRANT P.O. Box 190697 San Francisco, CA 94119	REIMBURSEMENT -- TRAVEL	11/04/92	\$150.00
	Disbursement for [X]General		
RAY H. GRANT P.O. Box 190697 San Francisco, CA 94119	REIMBURSEMENT -- TRAVEL	11/13/92	\$150.00
	Disbursement for [X]General		
RAY H. GRANT P.O. Box 190697 San Francisco, CA 94119	REIMBURSEMENT -- TRAVEL	11/20/92	\$1056.13
	Disbursement for [X]General		
Joe Grant 1902 Angelina Drive Garland, TX 75040	Payroll	10/15/92	\$1018.74
	Disbursement for [X]General		
Joe Grant 1902 Angelina Drive Garland, TX 75040	expense reimbursement	10/23/92	\$43.94
	Disbursement for [X]General		
Joe Grant 1902 Angelina Drive Garland, TX 75040	Payroll	10/30/92	\$1018.74
	Disbursement for [X]General		
Joe Grant 1902 Angelina Drive Garland, TX 75040	payroll	11/15/92	\$1018.74
	Disbursement for [X]General		
Joe Grant 1902 Angelina Drive Garland, TX 75040	payroll	11/15/92	\$7235.00
	Disbursement for [X]General		
Graphco Enterprises 5412-N Mooretown Road Williamsburg, VA 23188	Promotional materials	11/20/92	\$960.00
	Disbursement for [X]General		
SUBTOTAL of Disbursements This Page.....			\$17071.30
TOTAL This Period.....			

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SCHEDULE B: ITEMIZED DISBURSEMENTS
Operating Expenditures
PAGE 200 OF 252
FOR LINE NUMBER 23
NAME OF COMMITTEE(In Full)
 Perot '92 C00263148

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Full Name Mailing Address	Purpose of Disbursement	Date	Amount
MEETIPRANEAN PARTY 15111 ROCKSIDE ROAD BEDFORD HEIGHTS, OH 44146	MEETING EXPENSE Disbursement for [X]General	11/05/92	
Midland Daily News Information Requested	Advertising Disbursement for [X]General	10/16/92	\$426.00
Puss Melbye 3452 Dalston Lane Plano, TX 75023	Payroll Disbursement for [X]General	10/19/92	\$1103.60
Puss Melbye 3452 Dalston Lane Plano, TX 75023	Payroll Disbursement for [X]General	10/30/92	\$1103.60
Puss Melbye 3452 Dalston Lane Plano, TX 75023	REIMBURSEMENT -- TRAVEL Disbursement for [X]General	11/06/92	\$7897.50
Puss Melbye 3452 Dalston Lane Plano, TX 75023	REIMBURSEMENT -- TRAVEL Disbursement for [X]General	11/06/92	\$2172.09
Puss Melbye 3452 Dalston Lane Plano, TX 75023	REIMBURSEMENT -- TRAVEL Disbursement for [X]General	11/13/92	\$6342.00
Puss Melbye 3452 Dalston Lane Plano, TX 75023	payroll Disbursement for [X]General	11/15/92	\$1103.60
Puss Melbye 3452 Dalston Lane Plano, TX 75023	REIMBURSEMENT -- TRAVEL Disbursement for [X]General	11/20/92	\$2116.00
SUBTOTAL of Disbursements This Page.....			\$22591.30
TOTAL This Period.....			

SCHEDULE B **ITEMIZED DISBURSEMENTS**
Operating Expenditures

 PAGE 201 OF **358**
 FOR LINE NUMBER 23

 NAME OF COMMITTEE (in Full)
 Perot '92 C00263145

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Name Mailing Address	Purpose of Disbursement	Date	Amount
Paul Meltzer 1441 Dalton Lane Dallas, TX 75023	REIMBURSEMENT -- TRAVEL Disbursement for (X) General	11/23/92	\$330.91
Steve Meltzer 100 Rector Place #6U New York, NY 10280	*transportation Disbursement for (X) General	10/13/92	\$35.00 IN-KIND Footnote: 13
Steve Meltzer 100 Rector Place #6U New York, NY 10280	*Auto/Van Rental Disbursement for (X) General	10/23/92	\$207.00 IN-KIND Footnote: 13
Steve Meltzer 100 Rector Place #6U New York, NY 10280	*Equipment Rental Disbursement for (X) General	11/14/92	\$327.00 IN-KIND Footnote: 13
Memorex Telex P.O. Box 103371 Atlanta, GA 30348	computer services Disbursement for (X) General	10/23/92	\$8227.00
Memorial Colloquium Information Requested	event expense Disbursement for (X) General	10/23/92	\$1000.00
MESSAGE COM USA 24532 LORAIN ROAD NORTH OLMS TED, OH 44070	TELEPHONE EXPENSE Disbursement for (X) General	10/21/92	\$50.00
MESSAGE COM USA 24532 LORAIN ROAD NORTH OLMS TED, OH 44070	TELEPHONE EXPENSE Disbursement for (X) General	10/22/92	\$459.00
MET-ED Metropolitan Edison 501 Parkway Blvd York, PA 17404	printing Disbursement for (X) General	10/27/92	\$50.00
SUBTOTAL of Disbursements This Page.....			\$1449.91
TOTAL This Period.....			

SCHEDULE B
Operating Expenditures
ITEMIZED DISBURSEMENTS

 PAGE 234 OF 368
 FOR LINE NUMBER 23

 NAME OF COMMITTEE (in Full)
 Perot '92 C00263145

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 commercial purposes, other than using the name and address of any political
 committee to solicit contributions from such committee.

Full Name Mailing Address	Purpose of Disbursement	Date	Amount
JAVIER PEREZ 4917 Reunion Dr. Plano, TX 75024	Payroll	10/23/92	\$1146.00
	Disbursement for (X)General		
JAVIER PEREZ 4917 Reunion Dr. Plano, TX 75024	reimbursement -- travel	10/23/92	\$404.00
	Disbursement for (X)General		
JAVIER PEREZ 4917 Reunion Dr. Plano, TX 75024	Payroll	10/30/92	\$1146.00
	Disbursement for (X)General		
JAVIER PEREZ 4917 Reunion Dr. Plano, TX 75024	payroll	11/15/92	\$1146.00
	Disbursement for (X)General		
Beverly Perkins 4910 E. Hwy NW Columbia, MD 65201	office supplies	10/26/92	\$169.15
	Disbursement for (X)General		IN-KIND
Beverly Perkins 4910 E. Hwy NW Columbia, MD 65201	travel	11/04/92	\$36.04
	Disbursement for (X)General		IN-KIND
Beverly Perkins 4910 E. Hwy NW Columbia, MD 65201	postage; telephone expens	11/12/92	\$56.04
	Disbursement for (X)General		IN-KIND
Ralph Perkins 4355 RIVERLAND #3 STERLING HEIGHTS, MI 48314	reimbursement -- travel	10/23/92	\$3389.60
	Disbursement for (X)General		
Ralph Perkins 4355 RIVERLAND #3 STERLING HEIGHTS, MI 48314	REIMBURSEMENT -- TRAVEL	11/20/92	\$143.00
	Disbursement for (X)General		
SUBTOTAL of Disbursements This Page.....			\$1146.00
TOTAL This Period.....			\$1146.00

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NAME, ADDRESS, CITY, STATE, ZIP CODE		DATE OF DISBURSEMENT	AMOUNT
Mark Greene 6904 Benito Court Fort Worth, TX 76126		Payroll	3/27/92 \$888.00
Mark Greene 6904 Benito Court Fort Worth, TX 76126		Payroll	3/28/92 \$888.00
COMP, USA P.O. Box 98344 Chicago, IL 60698		Computers	3/28/92 \$384.25
COMP, USA P.O. Box 98344 Chicago, IL 60698		Computers	3/28/92 \$4,357.00
Perot Systems Corporation 9801 Spring Valley Road Suite 81878 West Dallas, TX 75240		Equipment	3/28/92 \$25,000.00
COMP, USA P.O. Box 98344 Chicago, IL 60698		Software	3/28/92 \$427.82
Wood Printing Company P.O. Box 152800 Dallas, TX 75215-2800		Office Supplies	3/28/92 \$99.27
Wilson Business Products P.O. Box 970000 Dallas, TX 75397		Furniture Rental	3/28/92 \$1,182.00
SUBTOTAL OF DISBURSEMENTS THIS PAGE (NUMBER)			\$38,030.08
TOTAL THIS PERIOD (SEE PAGE TWO FOR OTHERS)			

FINANCIAL RECEIPTS FROM CANDIDATE

NAME, ADDRESS, CITY, STATE, ZIP CODE		NAME OF EMPLOYER	DATE	AMOUNT
Any information entered on this form is subject to audit and becoming a part of the record of the campaign. It is the responsibility of the contributor to ensure that the information is accurate and complete. Any false or misleading information may result in civil or criminal penalties.				
NAME, ADDRESS, CITY, STATE, ZIP CODE Ross Perot 12377 Merit Dr. Dallas, TX 75251		self-employed businessman ADMINISTRATIVE YEAR-TO-DATE \$10,000.00	1/12/92	\$10,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Ross Perot 12377 Merit Dr. Dallas, TX 75251		self-employed businessman ADMINISTRATIVE YEAR-TO-DATE \$100,000.00	1/12/92	\$90,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Ross Perot 12377 Merit Dr. Dallas, TX 75251		self-employed businessman ADMINISTRATIVE YEAR-TO-DATE \$150,000.00	1/19/92	\$90,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Ross Perot 12377 Merit Dr. Dallas, TX 75251		self-employed businessman ADMINISTRATIVE YEAR-TO-DATE \$200,000.00	1/20/92	\$90,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Ross Perot 12377 Merit Dr. Dallas, TX 75251		self-employed businessman ADMINISTRATIVE YEAR-TO-DATE \$250,000.00	1/20/92	\$90,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Ross Perot 12377 Merit Dr. Dallas, TX 75251		self-employed businessman ADMINISTRATIVE YEAR-TO-DATE \$350,000.00	2/20/92	\$90,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Ross Perot 12377 Merit Dr. Dallas, TX 75251		self-employed businessman ADMINISTRATIVE YEAR-TO-DATE \$400,000.00	1/30/92	\$150,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Ross Perot 12377 Merit Dr. Dallas, TX 75251		self-employed businessman ADMINISTRATIVE YEAR-TO-DATE \$409,823.77	1/12-3/31/92	\$9,823.77 In-kind
SUBTOTAL OF RECEIPTS THIS PAGE (optional)				\$409,823.77
TOTAL THIS PERIOD (for page this line number only)				\$409,823.77

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SCHEDULE B
Operating Expenditures
ITEMIZED DISBURSEMENTS

 PAGE 82 OF 113
 FOR LINE NUMBER 23

 NAME OF COMMITTEE(In Full)
 Perot Petition Committee C00263148

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Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
N Ross Perot 12377 Merit Dr #1700 Dallas, TX 75251-	payroll	04/30/92	\$94383.57
	Disbursement for (X)General		IN-KIND
Alan Peters 1020 NE 3rd Portland, OR 97209-	rent	04/18/92	\$733.20
	Disbursement for (X)General		
Casey Peterson		04/29/92	\$320.00
	Disbursement for (X)General		IN-KIND
Ronald A Pettie 6907 Remwhite Dr Dallas, TX 75231-	contract labor	04/09/92	\$475.00
	Disbursement for (X)General		
Ronald A Pettie 6907 Remwhite Dr Dallas, TX 75231-	contract labor	04/22/92	\$775.00
	Disbursement for (X)General		
Ron Pettit 3113 Sun Valley Irving, TX 76062-	contract labor	04/22/92	\$440.00
	Disbursement for (X)General		
Merideth Kay Pfister 18208 Bal Harbour Nassau Bay, TX 77058-	travel	04/20/92	\$63.50
	Disbursement for (X)General		
SUBTOTAL of Disbursements This Page.....>			\$97190.27
TOTAL This Period.....>			

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SCHOOL'S	ISSUED DOCUMENTS
Operating Expenditures	

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FOR LINE NUMBER 23

NAME OF COMMITTEE(In Full)
Forest Protection Committee 000263148

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Mike Parise 320 Coney Island Drive Sparks, NV 89431-	promotional materials	04/02/92	\$580.00 IN-KIND
Disbursement for (X)General			
Bob Peck 1016 San Jacinto #1427 Irving, TX 75063-	travel; parking; lodging	04/08/92	\$477.00
Disbursement for (X)General			
Ralph W Perkins 8388 Riverland #3 Sterling Heights, MI 48314-	travel; lodging; telephone	04/13/92	\$2336.33
Disbursement for (X)General			
Perot Investments In 12377 Perot Dr #1700 Dallas, TX 75281-	payroll	04/29/92	\$2000.00
Disbursement for (X)General			
Perot Systems Corp 5001 Spring Valley Rd Suite #1 Dallas, TX 75240-	payroll	04/01/92	\$20000.00
Disbursement for (X)General			
H Ross Perot 12377 Perot Dr #1700 Dallas, TX 75281-	telephone expenses	04/20/92	\$707.32 IN-KIND
Disbursement for (X)General			
H Ross Perot 12377 Perot Dr #1700 Dallas, TX 75281-	rent	04/20/92	\$4836.12 IN-KIND
Disbursement for (X)General			
SUBTOTAL of Disbursements This Page.....>			\$30906.03
TOTAL This Period.....>			

SCHEDULE A **ITEMIZED RECEIPTS**
Contributions from the Candidate

PAGE 2 OF 2
FOR LINE NUMBER 17(d)

NAME OF COMMITTEE (in Full)
Perot Petition Committee C00263145

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.

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
H Ross Perot 12377 Merit Dr #1700	Self Businessman	04/24/92	\$100000.00
Dallas, TX 75251- Receipt for (X)General		Aggregate YTD > \$1059823.77	
H Ross Perot 12377 Merit Dr #1700	Self Businessman	04/29/92	\$100000.00
Dallas, TX 75251- Receipt for (X)General		Aggregate YTD > \$1159823.77	
H Ross Perot 12377 Merit Dr #1700	Self Businessman	04/30/92	\$707.83 IN-KIND
Dallas, TX 75251- Receipt for (X)General		telephone expense Aggregate YTD > \$1166831.29	
H Ross Perot 12377 Merit Dr #1700	Self Businessman	04/30/92	\$4838.12 IN-KIND
Dallas, TX 75251- Receipt for (X)General		rent Aggregate YTD > \$1168366.41	
H Ross Perot 12377 Merit Dr #1700	Self Businessman	04/30/92	\$94383.87 IN-KIND
Dallas, TX 75251- Receipt for (X)General		payroll Aggregate YTD > \$1669573.75	
SUBTOTAL of Receipts This Page.....			> \$299926.21
TOTAL This Period.....			> \$849926.21

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SCHEDULE B
Operating Expenditures
ITEMIZED DISBURSEMENTS
PAGE 150 OF 171
FOR LINE NUMBER 23
NAME OF COMMITTEE (in full)
 Perot Petition Committee C00263145

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Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Perot Systems PO Box 841539 Dallas, TX 75248-1539	Personnel Disbursement for (X)General	05/15/92	\$30800.00
Perot Systems 5001 Spring Valley Road Suite Dallas, TX 75244-	Personnel Disbursement for (X)General	05/28/92	\$20000.00
Perot Systems Corpor 12377 Marit Drive Suite 1600 Dallas, TX 75251-	Payroll Disbursement for (X)General	05/07/92	\$18000.00
H Rose Perot 12377 Marit Dr Ste 1700 Dallas, TX 75251-	payroll Disbursement for (X)General	05/31/92	\$101379.35 IN-KIND
H Rose Perot 12377 Marit Dr Ste 1700 Dallas, TX 75251-	telephone expenses Disbursement for (X)General	05/31/92	\$931.18 IN-KIND
H Rose Perot 12377 Marit Dr Ste 1700 Dallas, TX 75251-	rent Disbursement for (X)General	05/31/92	\$4835.12 IN-KIND
Alan Peters 1020 NE 3rd Avenue, Suite 100 Portland, OR 97232-	Rent Disbursement for (X)General	05/08/92	\$468.00
SUBTOTAL of Disbursements This Page.....>			\$176413.65
TOTAL This Period.....>			

0240343582271

SCHEDULE A
ITEMIZED RECEIPTS
Contributions from the Candidate
PAGE 2 OF 3
FOR LINE NUMBER 17(d)
NAME OF COMMITTEE (in Full)
 Perot Petition Committee C00263145

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.

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	05/27/92	\$300000.00

Dallas, TX 75251-
 Receipt for [X]General Aggregate YTD > \$2509749.58

H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	05/28/92	\$35000.00
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Dallas, TX 75251-
 Receipt for [X]General Aggregate YTD > \$2544749.98

H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	05/29/92	\$35000.00
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Dallas, TX 75251-
 Receipt for [X]General Aggregate YTD > \$2579749.98

H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	05/29/92	\$50932.21
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Dallas, TX 75251-
 Receipt for [X]General Aggregate YTD > \$2630682.19

H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	05/31/92	\$101379.35 IN-KIND
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Dallas, TX 75251-
 Receipt for [X]General payroll
 Aggregate YTD > \$2732061.54

H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	05/31/92	\$931.18 IN-KIND
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Dallas, TX 75251-
 Receipt for [X]General telephone expenses
 Aggregate YTD > \$2732992.72

H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	05/31/92	\$4835.12 IN-KIND
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Dallas, TX 75251-
 Receipt for [X]General rent
 Aggregate YTD > \$2737827.84

SUBTOTAL of Receipts This Page..... > \$528077.86

TOTAL This Period..... >

22433433589d372

SCHEDULE A **ITEMIZED DISBURSEMENTS**
Operating Expenditures
PAGE 176 OF 21A
FOR LINE NUMBER 23
NAME OF COMMITTEE (in Full)
Perot Petition Committee C00261145

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

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Perot Group 12377 Merit Drive Suite 1700 Dallas, TX 75251	IBM XT COMPUTERS Disbursement for (X)General	06/10/92	\$1900.00
H Rose Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	payroll Disbursement for (X)General	06/30/92	\$108975.07 IN-KIND
H Rose Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	telephone expense Disbursement for (X)General	06/30/92	\$931.18 IN-KIND
H Rose Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	rent Disbursement for (X)General	06/30/92	\$4886.12 IN-KIND
Romy Perot 53 Washington Ave Endicott, NY 13760-	Event Disbursement for (X)General	06/08/92	\$232.69
Romy Perot 53 Washington Ave Endicott, NY 13760-	Printing Disbursement for (X)General	06/26/92	\$76.18
Romy Perot 53 Washington Ave Endicott, NY 13760-	Supplies Disbursement for (X)General	06/08/92	\$232.69 IN-KIND
Alan Peters 1020 NE 3rd Ave Ste 100 Portland, OR 97232-	Disbursement for (X)General	06/02/92	\$468.00 IN-KIND
Peterson company 6430 Callaghan Rd San Antonio, TX 78229-	Promotional Materials Disbursement for (X)General	06/26/92	\$721.00
SUBTOTAL of Disbursements This Page.....			\$118370.33
TOTAL This Period.....			>

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SCHEDULE A
ITEMIZED RECEIPTS

PAGE 2 OF 2
FOR LINE NUMBER 17(1)

NAME OF COMMITTEE/IN FULL:

Perot Political Committee 00261145

Any information copied from such Receipts and statements may not be used for
any purpose other than the purpose of reporting contributions to the
committee for general purposes, other than using the name and address of any political
committee to solicit contributions from such committee.

Full Name	Name of Employer	Date	Amount
Mailing Address	Occupation	MM/DD/YY	
H Ross Perot	Self		
12377 Merit Dr Ste 1700	Businessman		
Dallas, TX 75251-			
Receipt for [X] General	Aggregate YTD > \$4091895.63		
H Ross Perot	Self	06/30/92	\$155000.00
12377 Merit Dr Ste 1700	Businessman		
Dallas, TX 75251-			
Receipt for [X] General	Aggregate YTD > \$6246895.63		
H Ross Perot	Self	06/30/92	\$108975.07
12377 Merit Dr Ste 1700	Businessman		IN-KIND
Dallas, TX 75251-			
Receipt for [X] General	payroll Aggregate YTD > \$6355870.70		
H Ross Perot	Self	06/30/92	\$931.18
12377 Merit Dr Ste 1700	Businessman		IN-KIND
Dallas, TX 75251-			
Receipt for [X] General	telephone expense Aggregate YTD > \$6355801.58		
H Ross Perot	Self	06/30/92	\$435.11
12377 Merit Dr Ste 1700	Businessman		IN-KIND
Dallas, TX 75251-			
Receipt for [X] General	rent Aggregate YTD > \$6355801.58		
SUBTOTAL of Receipts This Period			
TOTAL This Period			

22 4.0, 4.3, 5.2, 1.3, 7.4

SCHEDULE B **ITEMISED DISBURSEMENTS**
Operating Expenditures

PAGE 218 OF 322
 FOR LINE NUMBER 23

NAME OF COMMITTEE (in Full)
 Perot Petition Committee C00263145

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

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Perot Systems Corporation P. O. Box 841539 Dallas, TX 75248-1539	computer services Disbursement for (X)General	07/03/92	\$174872.00
Perot Systems Corporation P. O. Box 841539 Dallas, TX 75248-1539	computer services Disbursement for (X)General	07/13/92	\$434428.89
Perot Systems Corporation P. O. Box 841539 Dallas, TX 75248-1539	computer services Disbursement for (X)General	07/31/92	\$100655.78
Personal Computer Rs 6400 Uptown NE #402-S Albuquerque, NM 87110-	Equipment Rent Disbursement for (X)General	07/16/92	\$267.48
Personal Service Co 1127 South Grand Street Springfield, IL 62700-	Promotional Materials Disbursement for (X)General	07/27/92	\$217.00
Personal Touch 8200 Brookriver Dr. W 109 Dallas, TX 75247	Contract Labor Disbursement for (X)General	07/09/92	\$8116.94
Jacques Peters 12920 Audelia #166 Dallas, TX 75243-	payroll Disbursement for (X)General	07/31/92	\$1406.04
Jacques Peters 12920 Audelia #166 Dallas, TX 75243-	payroll Disbursement for (X)General	07/31/92	\$213.10
Jacques Peters 12920 Audelia #166 Dallas, TX 75243-	payroll Disbursement for (X)General	07/31/92	\$703.02
SUBTOTAL of Disbursements This Page.....>			\$725860.25
TOTAL This Period.....>			

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 92031752013

SCHEDULE A **ITEMIZED RECEIPTS**
Contributions from the Candidate
PAGE 2 OF 3
FOR LINE NUMBER 17(d)
NAME OF COMMITTEE (in Full)

Perot Petition Committee C00263145

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

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	Self Businessman	07/20/92	\$210000.00
Receipt for [X]General	Aggregate YTD >		\$9916637.00
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	Self Businessman	07/20/92	\$100000.00
Receipt for [X]General	Aggregate YTD >		\$10016637.0
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	Self Businessman	07/24/92	\$550000.00
Receipt for [X]General	Aggregate YTD >		\$10566637.0
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	Self Businessman	07/27/92	\$630000.00
Receipt for [X]General	Aggregate YTD >		\$11196637.0
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	Self Businessman	07/31/92	\$109399.44 IN-RIND
Receipt for [X]General	Payroll Aggregate YTD >		\$11306036.4
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	Self Businessman	07/31/92	\$4835.12 IN-RIND
Receipt for [X]General	Rent Aggregate YTD >		\$11310871.6
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	Self Businessman	07/31/92	\$931.18 IN-RIND
Receipt for [X]General	Telephone Expense Aggregate YTD >		\$902.7
SUBTOTAL of Receipts This Page.....			> \$1605165.74
TOTAL This Period.....			

92,404,351.376

CONTRIBUTIONS A
FINISHED RECEIPTS
Contributions from the Candidate
PAGE 2 OF 2
FOR LINE NUMBER 17(4)
NAME OF COMMITTEE(In Full)
Parot Petition Committee C00263148

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

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
H Ross Parot 12377 Merit Dr Ste 1700	Self Businessman	08/31/92	\$4835.12 IN-KIND
Dallas, TX 75251- Receipt for (X)General	Rent Aggregate YTD > \$15073030.5		
H Ross Parot 12377 Merit Dr Ste 1700	Self Businessman	08/31/92	\$61316.20 IN-KIND
Dallas, TX 75251- Receipt for (X)General	Payroll Aggregate YTD > \$15154346.7		
H Ross Parot 12377 Merit Dr Ste 1700	Self Businessman	08/31/92	\$900000.00
Dallas, TX 75251- Receipt for (X)General	Aggregate YTD > \$16099346.72		
SUBTOTAL of Receipts This Page.....			> \$1071151.12
TOTAL This Period.....			> \$3087543.90

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SCHEDULE A **ITEMIZED RECEIPTS**
Contributions from the Candidate
PAGE 1 OF 2
FOR LINE NUMBER 17(d)
RANGE OF COMMITTEE (in Full)
 Perot Petition Committee C00263143

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

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	08/07/92	\$495000.00
Dallas, TX 75251- Receipt for [X]General		Aggregate YTD > \$12806802.7	
H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	08/11/92	\$225000.00
Dallas, TX 75251- Receipt for [X]General		Aggregate YTD > \$13031802.7	
H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	08/12/92	\$470000.00
Dallas, TX 75251- Receipt for [X]General		Aggregate YTD > \$13501802.7	
H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	08/13/92	\$600000.00
Dallas, TX 75251- Receipt for [X]General		Aggregate YTD > \$14301802.7	
H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	08/18/92	\$130000.00
Dallas, TX 75251- Receipt for [X]General		Aggregate YTD > \$14456802.7	
H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	08/19/92	\$610000.00
Dallas, TX 75251- Receipt for [X]General		Aggregate YTD > \$15066802.7	
H Ross Perot 12377 Merit Dr Ste 1700	Self Businessman	08/31/92	\$1392.46 IN-RIND
Dallas, TX 75251- Receipt for [X]General		Telephone Expense Aggregate YTD > \$5268195.4	
SUBTOTAL of Receipts This Page.....			> \$2756392.66
TOTAL This Period.....			>

 8
 7
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SCHEDULE B **ITEMIZED DISBURSEMENTS**
Operating Expenditures

 PAGE 136 OF 207
 FOR LINE NUMBER 23

 NAME OF COMMITTEE (in Full)
 Perot '92 C00263145

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

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Permanent Promotions 1619 Hatches Drive Arlington, TX 76014-	promotional materials Disbursement for (X)General	09/10/92	\$908.50
Perot Systems Corporation P. O. Box 841839 Dallas, TX 75248-1839	consulting Disbursement for (X)General	09/18/92	\$42623.58
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251-	payroll Disbursement for (X)General	09/30/92	\$54131.10 IN-KIND
Allen E. Perrot 1000 Litton Lane Suffolk, VA 23434	media placement Disbursement for (X)General	09/11/92	\$285.23 IN-KIND
HELEN PERRY 1324 S. WICHAM STB. 104 TYLER, TX 75701	PRINTING Disbursement for (X)General	09/04/92	\$349.86 IN-KIND
Personal Computer Co 840 University Avenue Rochester, NY 14607-	Computer Services Disbursement for (X)General	09/17/92	\$431.30
Personal Service Company 1127 South Grand East P.O. Box 4806 Springfield, IL 62708	Promotional materials Disbursement for (X)General	09/04/92	\$3139.54
Walter C Peters 1807 E Indian School Phoenix, AZ 85018-	Furniture/Equipment Lease Disbursement for (X)General	09/29/92	\$1000.00
Ronald A. Pettie 6907 Hawthite Drive Dallas, TX 75231	security Disbursement for (X)General	09/18/92	\$960.00
SUBTOTAL of Disbursements This Page.....>			\$103899.11
TOTAL This Period.....>			

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 37151542
 3591379
 19191379

SCHEDULE B **ITEMIZED DISBURSEMENTS**
Operating Expenditures
PAGE 235 OF 358
FOR LINE NUMBER 21
NAME OF COMMITTEE (in Full)
 000263145

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

Full Name Mailing Address	Purpose of Disbursement	Date	Amount
Permanent Promotions P.O. Box 300335 Arlington, TX 76014	Promotional Materials		
	Disbursement for [X] General		
Ernie Perry 1117 Merit Dr. Ste 1700 Dallas, TX 75251	payroll	11/23/91	\$1196.45
	Disbursement for [X] General		IN-KIND
Ernie Perry 1117 Merit Dr. Ste 1700 Dallas, TX 75251	telephone expense	11/23/91	\$1088.99
	Disbursement for [X] General		IN-KIND
ERNE PERRY 1314 S. Beckham Ste. 104 Tyler, TX 75701	event expense	11/23/91	\$1213.90
	Disbursement for [X] General		IN-KIND Footnote: 13
Ernie Perry 1314 S Beckham Ste 104 Tyler, TX 75701	Replenish Petty Cash	10/26/91	\$400.00
	Disbursement for [X] General		
Ernie Perry 112 S. Park St. Knoxville, IL 61448	event expense	10/23/91	\$1891.55
	Disbursement for [X] General		IN-KIND Footnote: 13
Sharon Perry 4534 W. Walker Pl. Littleton, CO 80123	Information Requested	10/19/91	\$370.00
	Disbursement for [X] General		IN-KIND
Sharon Perry 4534 W. Walker Pl. Littleton, CO 80123	Information Requested	11/02/91	\$325.00
	Disbursement for [X] General		IN-KIND
Personal Service Company 1117 South Grand East P.O. Box 4586 Springfield, IL 62708	Promotional Materials	11-20-91	\$5117.50
	Disbursement for [X] General		
TOTAL of Disbursements This Page			\$5519.90
TOTAL This Period			

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SCHEDULE A **ITEMIZED RECEIPTS**
Contributions from the Candidate
PAGE 2 OF 2
FOR LINE NUMBER 17(d)
NAME OF COMMITTEE (in Full)
 Rep. J. C. Carr 263145

Any amount included from such reports and statements may not be used for any other purpose than the purposes of soliciting contributions or for any other purpose, other than using the name and address of any political organization to solicit contributions from such committee.

Full Name Address	Name of Employer Occupation	Date	Amount
Rep. J. C. Carr 263145	Self Businessman	11/23/91	\$41196.00
Aggregate YTD > \$5411116.41			
Rep. J. C. Carr 263145	Self Businessman	11/23/91	\$41196.00
Aggregate YTD > \$54212313.27			
Rep. J. C. Carr 263145	Self Businessman	11/23/91	\$2088.00
Aggregate YTD > \$54214402.26			
Rep. J. C. Carr 263145	Self Businessman	11/23/91	\$2088.00
Aggregate YTD > \$54214402.26			
TOTAL of Receipts This Page.....			\$2249399.44
TOTAL This Period.....			\$9449936.44

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SCHEDULE B
Operating Expenditures
ITEMIZED DISBURSEMENTS
PAGE 59 OF
FOR LINE NUMBER 23
NAME OF COMMITTEE (in Full)
 Perot '92 C00263145

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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Ralph Perkins 8355 RIVERLAND #3 STERLING HEIGHTS, MI 48314	TRAVEL REIMBURSEMENT Disbursement for (X)General	12/31/92	\$2201.55
Ralph Perkins 8355 RIVERLAND #3 STERLING HEIGHTS, MI 48314	REIMBURSEMENT FOR LODGING Disbursement for (X)General	12/31/92	\$3197.55
Ralph Perkins 8355 RIVERLAND #3 STERLING HEIGHTS, MI 48314	payroll Disbursement for (X)General	12/18/92	\$1364.39
Ralph Perkins 8355 RIVERLAND #3 STERLING HEIGHTS, MI 48314	payroll Disbursement for (X)General	12/18/92	\$16941.52
Ralph Perkins 8355 RIVERLAND #3 STERLING HEIGHTS, MI 48314	payroll Disbursement for (X)General	12/31/92	\$1364.39
Perot Systems Corporation P. O. Box 841539 Dallas, TX 75248	Consulting Disbursement for (X)General	12/31/92	\$14746.47
H Ross Perot 12377 Marit Drive Suite 1700 Dallas, TX 75251	payroll Disbursement for (X)General	12/31/92	\$42883.67 IN-KIND
Personal Service Company 1129 South Grand East P.O. Box 4586 Springfield, IL 62706	Promotional Materials Disbursement for (X)General	12/18/92	\$1126.13
George M. Phillippi 3344 Baton Road Birmingham, AL 35223	*AL-Misc. Expenses Disbursement for (X)General	12/18/92	\$9562.22 IN-KIND Footnote: 13
SUBTOTAL of Disbursements This Page.....>			\$97187.89
TOTAL This Period.....>			

2, 3, 4, 5, 9, 13, 8, 2

SCHEDULE A **ITEMIZED RECEIPTS**
Contributions from the Candidate

PAGE 1 OF _____
 FOR LINE NUMBER 17(d)

NAME OF COMMITTEE(In Full)
 Perot '92 C00263145

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

Full Name Mailing Address	Name of Employer: Occupation	Date MM/DD/YY	Amount
H Ross Perot 12377 Merit Drive Suite 1700 Dallas, TX 75251	Self Businessman	11/27/92	\$813813.72
Receipt for [X]General		Aggregate YTD > \$56988215.98	
H Ross Perot 12377 Merit Drive Suite 1700 Dallas, TX 75251	Self Businessman	11/30/92	\$744090.01
Receipt for [X]General		Aggregate YTD > \$57732305.99	
H Ross Perot 12377 Merit Drive Suite 1700 Dallas, TX 75251	Self Businessman	12/08/92	\$809845.06
Receipt for [X]General		Aggregate YTD > \$58543151.05	
H Ross Perot 12377 Merit Drive Suite 1700 Dallas, TX 75251	Self Businessman	12/31/92	\$42883.67 IN-KIND
Receipt for [X]General		Aggregate YTD > \$58585034.72	
SUBTOTAL of Receipts This Page.....>			\$2410632.46
TOTAL This Period.....>			\$2410632.46

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SCHEDULE A
Contributions from the Candidate

 PAGE 1 OF 4
 FOR LINE NUMBER 17(d)

NAME OF COMMITTEE (in Full)

Perot '92 C00263145

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	06/01/92	\$40000.00 Footnote: 4
Receipt for [X] General	Aggregate YTD > \$3277827.84		
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	08/21/92	\$200000.00 Footnote: 4
Receipt for [X] General	Aggregate YTD > \$15366882.74		
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	10/07/92	\$3007150.00 IN-KIND Footnote: 37
Receipt for [X] General	*media placement Aggregate YTD > \$23447627.82		
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	10/08/92	\$2095106.00 IN-KIND Footnote: 37
Receipt for [X] General	*media placement Aggregate YTD > \$25542813.82		
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	10/09/92	\$3960575.00 IN-KIND Footnote: 37
Receipt for [X] General	*media placement Aggregate YTD > \$10243388.82		
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	10/13/92	\$14152461.00 IN-KIND Footnote: 37
Receipt for [X] General	*media placement Aggregate YTD > \$45564147.82		
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	10/13/92	\$30000.00 Footnote: 4
Receipt for [X] General	Aggregate YTD > \$45594147.82		
SUBTOTAL of Receipts This Page..... > \$22485372.00			
TOTAL This Report..... >			

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SECTION 2
RETURNED RECEIPTS
Contributions from the Candidate
PAGE 2 OF 4
FOR LINE NUMBER 17(d)
NAME OF CONTRIBUTOR (in Full)
Parcel '92 C00363145

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 collect contributions from such committee.

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
H Ross Parot 12377 Marit Dr Ste 1700	Self Businessman	10/14/92	\$1404290.00 IN-KIND Footnote: 37
Dallas, TX 75261 Receipt for [X] General	*media placement Aggregate YTD > \$40990445.02		
H Ross Parot 12377 Marit Dr Ste 1700	Self Businessman	10/20/92	\$149049.00 IN-KIND Footnote: 37
Dallas, TX 75261 Receipt for [X] General	*media placement Aggregate YTD > \$40997294.02		
H Ross Parot 12377 Marit Dr Ste 1700	Self Businessman	10/20/92	\$450000.00 IN-KIND Footnote: 37
Dallas, TX 75261 Receipt for [X] General	*media placement Aggregate YTD > \$40407294.02		
H Ross Parot 12377 Marit Dr Ste 1700	Self Businessman	10/22/92	\$314500.00 IN-KIND Footnote: 37
Dallas, TX 75261 Receipt for [X] General	*media Placement Aggregate YTD > \$40001794.02		
H Ross Parot 12377 Marit Dr Ste 1700	Self Businessman	10/23/92	\$192650.00 IN-KIND Footnote: 37
Dallas, TX 75261 Receipt for [X] General	*media placement Aggregate YTD > \$40994444.02		
H Ross Parot 12377 Marit Dr Ste 1700	Self Businessman	10/24/92	\$216750.00 IN-KIND Footnote: 37
Dallas, TX 75261 Receipt for [X] General	*media placement Aggregate YTD > \$49211194.02		
H Ross Parot 12377 Marit Dr Ste 1700	Self Businessman	10/25/92	\$147307.00 IN-KIND Footnote: 37
Dallas, TX 75261 Receipt for [X] General	*media placement Aggregate YTD > \$49350501.02		
SUBTOTAL of Receipts This Page.....			\$2875354.00

TOTAL OF ALL RECEIPTS.....

STATE OF TEXAS COMMISSION ON ETHICS

PAGE 3 OF 4
FOR LINE NUMBER 17(d)

NAME OF CONTRIBUTOR (in Full)
Perot '92 C06363145

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 collect contributions from such committee.

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	10/26/92	\$500000.00 IN-KIND Footnote: 37
Receipt for [X] General *media placement Aggregate YTD > \$40626601.82			
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	10/26/92	\$3006330.00 IN-KIND Footnote: 37
Receipt for [X] General *media placement Aggregate YTD > \$61624040.82			
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	10/26/92	\$883654.00 IN-KIND Footnote: 37
Receipt for [X] General *media placement Aggregate YTD > \$54326494.82			
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	10/26/92	\$817829.00 IN-KIND Footnote: 37
Receipt for [X] General *media placement Aggregate YTD > \$55146323.82			
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	11/01/92	\$320153.00 IN-KIND Footnote: 37
Receipt for [X] General *media placement Aggregate YTD > \$55466476.82			
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	11/01/92	\$425000.00 IN-KIND Footnote: 37
Receipt for [X] General *media placement Aggregate YTD > \$55091476.82			
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	Self Businessman	11/02/92	\$470000.00 IN-KIND Footnote: 37
Receipt for [X] General *media placement Aggregate YTD > \$56361476.82			
SUBTOTAL of Receipts This Page.....			\$7002975.00
TOTAL This Period.....			

24043591308

SCHEDULE B **ITEMIZED DISBURSEMENTS**
Operating Expenditures
PAGE 348 OF 302
FOR LINE NUMBER 23
NAME OF COMMITTEE (in Full)
 PEROT 1992 002163145

Information copied from all 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.

Full Name Mailing Address	Purpose of Disbursement	Date	Amount	Footnote
		MM DD YY		
Permanent Promotions 1419 Natches Drive Arlington, TX 76014	*Promotional Materials	10/15/92	\$424	Footnote: 4
Permanent Promotions 1419 Natches Drive Arlington, TX 76014	*Promotional Materials	10/20/92	\$240.00	Footnote: 4
Permanent Promotions 1419 Natches Drive Arlington, TX 76014	*Promotional Materials	10/27/92	\$663.50	Footnote: 4
Permanent Promotions 1419 Natches PO Box 300338 Arlington, TX 76014	*promotional materials	10/28/92	\$2393.25	Footnote: 4
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement	10/07/92	\$2007150.00	IN-KIND Footnote: 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement	10/08/92	\$2095186.00	IN-KIND Footnote: 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement	10/09/92	\$3960575.00	IN-KIND Footnote: 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement	10/13/92	\$14152461.00	IN-KIND Footnote: 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement	10/14/92	\$1404298.00	IN-KIND Footnote: 37
SUBTOTAL of Disbursements This Page			\$2463390.25	
TOTAL This Period				

SCHEDULE B **ITEMIZED DISBURSEMENTS**
Operating Expenditures

PAGE 34 OF 502
 FOR LINE NUMBER 21

NAME OF COMMITTEE (in Full)

Perot '92 C00261145

Any information copied from such Reports and Statements may not be used in testimony 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.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD YY	Amount
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	10/20/92	\$149849 00 IN-KIND Footnote 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	10/20/92	\$450600 00 IN-KIND Footnote 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*Media Placement Disbursement for (X)General	10/22/92	\$314500 00 IN-KIND Footnote: 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	10/23/92	\$192650.00 IN-KIND Footnote 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	10/24/92	\$216750.00 IN-KIND Footnote: 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	10/25/92	\$147107 00 IN-KIND Footnote 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	10/26/92	\$500000 00 IN-KIND Footnote 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	10/26/92	\$3666119 00 IN-KIND Footnote 37
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	10 26 92	\$801654 IN-KIND Footnote 37
SUBTOTAL of Disbursements This Page			\$6441049
TOTAL This Period			

SCHEDULE B
Operating Expenditures
ITEMIZED DISBURSEMENTS
PAGE 300 OF 302
FOR LINE NUMBER 23
NAME OF COMMITTEE (in Full)
 Perot '92 C06263145

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 collect contributions from such committee

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	10/26/92	\$817829.00 IN-KIND Footnote: 3
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	11/01/92	\$320153.00 IN-KIND Footnote: 3
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	11/01/92	\$425000.00 IN-KIND Footnote: 3
H Ross Perot 12377 Merit Dr Ste 1700 Dallas, TX 75251	*media placement Disbursement for (X)General	11/02/92	\$470000.00 IN-KIND Footnote: 37
PERRY HI-WAY HOBS CO P.O. BOX 3351 SOUTH ERIE STATION ERIE, PA 16500	*event expense Disbursement for (X)General	08/01/92	\$325.00 Footnote: 4
Harold Perry 102 S. Park St. Knoxville, IL 61440	*event expense Disbursement for (X)General	10/23/92	\$1891.50 Footnote: 7
PERSONAL SERVICE PO BOX 4586 SPRINGFIELD, IL 62708	*PROMOTIONAL MATERIALS Disbursement for (X)General	10/25/92	\$898.70 Footnote: 4
Peterson Company 1703 19th Street Hondo, TX 78861	*Promotional Material Disbursement for (X)General	10/27/92	\$2025.00 Footnote 4
Casey Peterson 505 Kansas City St. Rapid City, SD 57701	*Replenish Petty Cash Disbursement for (X)General	06/02/92	\$500.00 Footnote: 4
SUBTOTAL of Disbursements This Page			\$2038622.28
TOTAL This Period			

93030471

ATTACHMENT 4

94043591320

AFFIDAVIT OF MARK BLAHNIK

Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

I, MARK BLAHNIK, being duly sworn, depose and say:

1. During the period between March, 1992 and November, 1992, I provided services to Perot '92.
2. During the time period described above, I was exclusively employed by the Perot Group and did not receive compensation from any other source. The Perot Group is an unincorporated sole proprietorship owned by Ross Perot created for the purpose of managing Ross Perot's personal affairs.

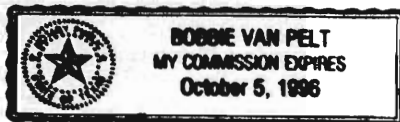
Mark Blahnik

MARK BLAHNIK

Sworn to before me this 20th
day of June, 1994

Bobbie Van Pelt

Notary Public



24043591391

AFFIDAVIT OF MIKE POSS

Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

I, MIKE POSS, being duly sworn, depose and say:

1. During the period between March, 1992 and November, 1992, I was the Treasurer of Perot '92.
2. During the time period described above, I was exclusively employed by the Perot Group and did not receive compensation from any other source. The Perot Group is an unincorporated sole proprietorship owned by Ross Perot created for the purpose of managing Ross Perot's personal affairs.

Mike Poss

MIKE POSS

Sworn to before me this 21
day of June, 1994

Bobbie Van Pelt

Notary Public



24043591392

AFFIDAVIT OF J. RUSS MONROE

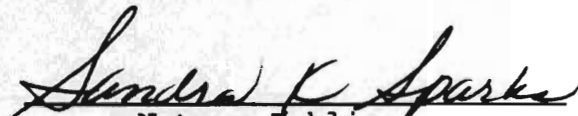
Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

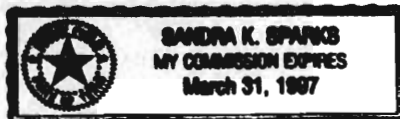
I, J. RUSS MONROE, being duly sworn, depose and say:

1. During the period between March, 1992 and November, 1992, I provided services to Perot '92.
2. During the time period described above, I was exclusively employed by the Perot Group and did not receive compensation from any other source. The Perot Group is an unincorporated sole proprietorship owned by Ross Perot created for the purpose of managing Ross Perot's personal affairs.


J. RUSS MONROE

Sworn to before me this 20th
day of June, 1994


Notary Public



24043591393

ATTACHMENT 5

24043591394

AFFIDAVIT OF ROSS CLAYTON MULFORD

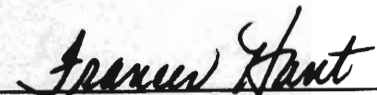
Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

I, ROSS CLAYTON MULFORD, being duly sworn, depose and say:

1. During the period between March, 1992 and November, 1992, I was General Counsel for Perot '92.
2. The Perot Group is an unincorporated sole proprietorship owned by Ross Perot created to manage Ross Perot's personal affairs. Mike Poss, J. Russ Monroe, and Mark Blahnik were employed by the Perot Group during the time period described above. These employees were paid only from funds of the Perot Group, an unincorporated sole proprietorship, and did not receive any payment from any corporate source.


ROSS CLAYTON MULFORD

Sworn to before me this 17th
day of June, 1994


Notary Public



24043591395

SKADDEN, ARPS, SLATE, MEAGHER & LOM

1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107

FAX: (202) 393-5760

DIRECT DIAL
(202) 371-7007

(202) 371-7000

JUN 28 3 52 PM '94

BOSTON
BRUSSELS
CHICAGO
FRANKFURT
HONG KONG
LONDON
LOS ANGELES
NEW YORK
PARIS
SAN FRANCISCO
SYDNEY
TOKYO
TORONTO
WILMINGTON

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUN 29 10 01 AM '94

June 28, 1994

VIA HAND DELIVERY

Joan McEnery, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

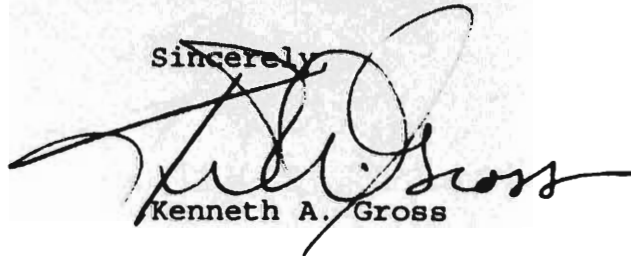
Re: MUR 3963 - Perot '92 and Mike Poss,
as Treasurer, Perot Systems Corpora-
tion, and Hillwood Development Corpo-
ration

Dear Ms. McEnery:

As discussed in the response filed yesterday,
please find enclosed the original copy of the affidavit
of Michelle Grant. Also enclosed is a fax copy of the
affidavit of Ralph Perkins stating that he was exclusive-
ly employed by Perot '92 during the period at issue in
this MUR. The original copy of Ralph Perkins' affidavit
will be forthcoming.

If you have any questions, please call me.

Sincerely,


Kenneth A. Gross

Enclosures

24043591396

AFFIDAVIT OF RALPH PERKINS

Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

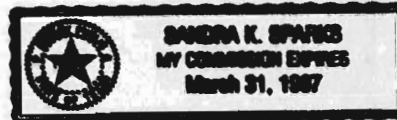
I, RALPH PERKINS, being duly sworn, depose and say:

1. During the period between March, 1992 and November, 1992, I worked for Perot '92.
2. During the time period described above, I was exclusively employed by Perot '92 and did not receive compensation from any other source.

Ralph Perkins
RALPH PERKINS

Sworn to before me this 28th
day of June, 1994

Sandra K. Sparks
Notary Public



24043591398

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017
314-878-0422

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE

June 7, 1994

JUN 13 3 26 PM '94

JUN 13 12 23 PM '94

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Office of General Counsel
The Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

Subject: Complaint against The Perot Petition Committee aka Perot '92
(7616 LBJ Freeway, Ste 727, Dallas, TX 75251) for unlawfully
investigating volunteers

Dear Sir:

On February 20, 1992, Ross Perot was interviewed on "Larry King Live." During the interview, Perot explained that he would run for president as an independent candidate if the people who wanted him to run organized themselves, and on their own registered him on the presidential ballot in all fifty states. I viewed this broadcast and decided to volunteer my assistance in the effort to place Ross Perot on the presidential ballot in Missouri. As there was a shortage of volunteers at the time, I also volunteered to be an elector. I also supported Ross Perot by selling Perot bumper stickers, buttons, and t-shirts. I registered this effort with the FEC. The purpose was to promote Ross Perot.

Mark Blahnik, acting as an agent of Perot (and being paid by The Perot Group--a corporation) hired Callahan & Gibbons in April and May of 1992 to assist with "security" of the petition drive. The actions taken by Callahan & Gibbons included, but were not limited to, investigating volunteers on Perot's petition drive. They were paid around \$100,000 to conduct these investigations by Perot through the Perot Petition Committee.

On May 5, 1992, Callahan & Gibbons obtained information on me from TRW through U.S. Datalink, an information broker in Baytown, TX. Ross Perot, The Perot Petition Committee, Callahan & Gibbons and U.S. Datalink did not intend to employ, promote, extend credit to, sell insurance to, or transact business with myself. The information was obtained without my authorization or knowledge.

On May 7, 1992, an access code belonging to Orix Credit Alliance, a furniture leasing company in Portland, Oregon, was used to obtain from Equifax consumer reports of at least eleven volunteers on Perot's petition drive. After conducting its own investigation, Equifax concluded that no one at Orix was responsible for obtaining these consumer reports. It is belief from the information I have that my full credit report (to include bank accounts with balance and account number and credit cards with balance and account numbers) were obtained from Equifax by means of the Orix Credit Alliance access code. Callahan & Gibbons, acting as agent of Ross Perot, used Orix Credit Alliance's access code to obtain my full credit report from Equifax. Ross Perot, The Perot Petition Committee, and Callahan & Gibbons did not intend to employ, promote, extend credit to, sell insurance to, or transact business with me. The information was obtained without my authorization or knowledge.

24043591399

24043591400

The investigations conducted by Perot and his agents became a matter of public inquiry in the fall of 1992. The national media reported that Clay Mulford, legal counsel to the Perot Petition Committee, admitted that the Perot Petition Committee did background checks and obtained credit information on various volunteers. Perot or representatives of the Perot Petition Committee made public statements justifying the investigations based on allegations that volunteers were misappropriating campaign funds or had criminal records. These statements were untrue about me and the other volunteers in Missouri. These false allegations cast aspersions on my character and placed me in a false light.

I was a financial advisor, in which personal reputation is critical. As a result of the Perot Petition Committee's conduct, I suffered damage to my professional reputation, I received threats by phone and mail, and experienced depression, anxiety, humiliation, and other types of mental and emotional distress.

I make the following allegations:

- 1) I charge Ross Perot, the Perot Petition Committee, and Mark Blahnik (Perot's agent) with violation of the Fair Credit Reporting Act, 15 U.S.C. SS 1681a-1681t. This prohibits any person from knowingly and willfully obtaining information on a consumer from a credit reporting agency under false pretenses. Perot, the Perot Petition Committee, Mark Blahnik and/or through other agents, obtained information on myself and other Missouri volunteers from consumer reporting agencies under false pretenses. Upon information and belief Callahan & Gibbons obtained consumer reports on myself and other Missouri volunteers from Equifax by means of an access code, and such unauthorized use of another's access code to obtain a consumer report from a consumer reporting agency is a violation of the Fair Credit Reporting Act. Callahan & Gibbons was acting as an agent or subagent of the Perot Petition Committee and Ross Perot. Mark Blahnik and the Perot Petition Committee were acting as agents of Ross Perot. A principal is held vicariously liable for the torts of its agents when the statements or acts constituting those torts are committed within the scope of the authority of such agents. The acts committed in obtaining information about me from Equifax under false pretenses were committed within the scope of their authority as agents of Ross Perot.
- 2) I charge Ross Perot, the Perot Petition Committee, and its agents with gross invasion of my privacy. My consumer report from Equifax in response to the Orix request on May 7, 1992 contained information which was of a personal and private nature. I have a right to keep that information private, as recognized by federal law which strictly limits the purposes for which Equifax may disclose my information. Callahan & Gibbons obtained private information on me for purposes other than those permitted by statute. Upon information and belief that Callahan & Gibbons, the Perot Petition Committee and Ross Perot obtained private information on me by means of deceit and false pretenses, and without a purpose recognized by the Fair Credit Reporting Act, in an objectionable manner. By their use of the Orix access code to obtain my consumer report constituted an

intrusion upon my seclusion and constituted an invasion of my privacy. As a result, I have suffered mental and emotional distress, anxiety, and other damages.

3) I charge Ross Perot, the Perot Petition Committee, and its agent Russ Melbye with False Imprisonment. On May 19, 1992, I was intentionally restrained in a meeting room at the Perot Petition Drive offices on Mason Road against my will. During the period of my detention, I did not remain in that meeting room willingly or voluntarily. The detention and restraint of myself was unlawful, in that I had Russ Melbye (acting as agent for Ross Perot) had no valid authority or right to detain or restrain me in such a manner. I knew the detention and restraint was unlawful, and wrongful. Russ Melbye was acting as agent or subagent to Ross Perot and the Perot Petition Committee. A principal is held vicariously liable for the torts of its agents, including false imprisonment, when the statements or acts constituting those torts are committed within the scope of the authority of such agent. The acts of Melbye in unlawfully restraining and detaining me against my will were committed within the scope of his authority as agent of Ross Perot. As a result of my false imprisonment I experienced mental and emotional distress and other damages.

4) I charge Ross Perot with negligence. Perot had a duty to exercise reasonable care in ensuring that his agents conduct of their activities, including those complained of herein, did not invade the privacy of myself, or cause me harm. This duty included taking reasonable actions to ensure that his agents did not violate federal statutes specified herein or the common law rights and privileges available to myself and upon which I had a right to rely. Perot failed to exercise reasonable control over his agents or to take any action to prevent the events complained of herein from occurring. Perot knew or should have known that in light of the nature of the activities undertaken by his agents the result of his failure to exercise his right to control his agents would result, and in fact did, in the illegal conduct and injury to myself as described herein. As a result of Perot's negligence, I suffered mental and emotional distress, anxiety, and other damages.

I make these charges against:

Ross Perot
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

The Perot Petition Committee
Mike Poss, Treasurer
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

Mark Blahnik
The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

Russ Melbye
The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251
or
3852 Dalston Lane
Plano, TX 75023

24043591401

Supporting documentation is enclosed. Other Missouri volunteers who experienced what I did are:

Kevin Laughlin
12384 Shoreridge Drive
Apartment E
Maryland Heights, MO 63043
314-275-8393

Carrie Alspaw
1402 Southgate Drive
St. Charles, MO 63304
314-928-5020

also,

Larry Way
1734 Marker Rd.
Middleton, MD 21769
301-371-6858


Edward Dyck

Subscribed and sworn before me on this 8th day of June 1994.

MARTINE F. LADIG
Notary Public—Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Nov. 22, 1996

24043591402

EXPLANATION

Credit Reports

Equifax

TRW

Edward Dyck-Missouri
Kevin Laughlin-MO
Mark Dotzler-MO
Carrie Alspaw-MO
Larry Way-Maryland

05-05-82
Balfalink Emp Svc

Edward Dyck-Missouri
Kevin Laughlin-MO
Mark Dotzler-MO
Carrie Alspaw-MO
7 other Missourians
according to Equifax

05-07-82
Orix Leasing
(stolen access code)

ALCIE
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Jan 13 12 21 PM '91

Illegal ↑ ↓

Illegal ↑ ↓
(Computer Hacking)

US Data Link

Aug. 9, 1993
"We entered your TRW credit
file for our client Callahan
& Gibbons for and 'address
update' under the guise of
'employment service' "

Bill Jones
President

Callahan & Gibbons (Professional
investigators)
Aug. 27, 1993
"We did a 'background check'
on you for our client The
Perot Petition Committee."

John Callahan
President

(Both firms got "full credit reports" to include all bank accounts with balance
and account numbers and credit cards with account balances and account numbers

Illegal

The Perot Petition Committee

Nov 22, 1993
"We employed Callahan &
Gibbons who used US Data Link"

Clay Mulford
General Counsel
Ross Perot son-in-law

\$100,000
The Federal Election Committee
(FEC)

The FEC has records indicating
that The Perot Petition Committee
paid Callahan & Gibbons about
\$100,000 for "background checks"
on volunteers.

8-14-92 to 8-28-92

↑ ↓

The Perot Petition Committee

(Computer Hacking observed by Bob Penn in Perot HQs)

↑

\$100,000

Mar. 20, 1992

Ross Perot tells FEC that
he is an "independent
candidate" for President.

Ross Perot

Mar. 25, 1992

Organization of The Perot
Petition Committee

Mike Poss
Treasurer

The Perot Petition Committee Members

Tom Luce-Co Chairman (employed by Hughes & Luce lawfirm)
Tom Barr-(Co Chair--employed by Cravath, Swain, & Moore lawfirm of NY
introduced the committee to Callahan & Gibbons
Mark Blanik-Head of Security for the committee and illegally paid by The
Perot Group (violation of FEC rules)
Russ Monroe-Employee of The Perot Group who gave my name to Blanik for invest

Illegal

STATEMENT OF ORGANIZATION		Donor information for contributions	
1. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		2. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
3. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		4. PHONE NUMBER (Area Code + Number) 214 343-1111	
5. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		6. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
7. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		8. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
9. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		10. PHONE NUMBER (Area Code + Number) 214 343-1111	
11. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		12. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
13. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		14. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
15. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		16. PHONE NUMBER (Area Code + Number) 214 343-1111	
17. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		18. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
19. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		20. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
21. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		22. PHONE NUMBER (Area Code + Number) 214 343-1111	
23. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		24. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
25. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		26. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
27. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		28. PHONE NUMBER (Area Code + Number) 214 343-1111	
29. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		30. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
31. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		32. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
33. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		34. PHONE NUMBER (Area Code + Number) 214 343-1111	
35. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		36. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
37. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		38. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
39. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		40. PHONE NUMBER (Area Code + Number) 214 343-1111	
41. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		42. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
43. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		44. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
45. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		46. PHONE NUMBER (Area Code + Number) 214 343-1111	
47. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		48. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
49. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		50. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
51. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		52. PHONE NUMBER (Area Code + Number) 214 343-1111	
53. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		54. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
55. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		56. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
57. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		58. PHONE NUMBER (Area Code + Number) 214 343-1111	
59. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		60. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
61. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		62. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
63. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		64. PHONE NUMBER (Area Code + Number) 214 343-1111	
65. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		66. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
67. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		68. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
69. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		70. PHONE NUMBER (Area Code + Number) 214 343-1111	
71. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		72. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
73. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		74. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
75. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		76. PHONE NUMBER (Area Code + Number) 214 343-1111	
77. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		78. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	
79. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION		80. NAME OF CONTRIBUTOR (Print Name) PEROT FOUNDATION	
81. ADDRESS AND CITY/STATE/ZIP 1000 LAKESHORE BLVD DALLAS, TEXAS 75270		82. PHONE NUMBER (Area Code + Number) 214 343-1111	
83. TYPE OF CONTRIBUTION (Check one) ☐ Cash ☐ In-kind ☐ Other		84. DATE OF CONTRIBUTION (Month/Day/Year) 01/01/92	

18 USCS § 1029

Unauthorized use of credit card account number covering valid, but unassigned, account constituted access device by which fraud was perpetrated under 18 USCS § 1029 even though no actual account existed. *United States v. Taylor* (1991, CA8 Minn.) 693 F2d 1030.
 Government properly charged defendant with 2 counts, occurring within one year of each other, of use of unauthorized access device where defendant argued that these counts were really one offense under statute prohibiting use during any one-year period to obtain anything of value aggregating \$1,000 or more during that period, because \$1,000 value requirement, not one-year period, is key to

CRIMES & CRIMINAL PROCEDURE

defining separate offenses. *United States v. Newman* (1988, DC Nev.) 701 F Supp 184.
 Indictment charging credit card fraud in violation of 18 USCS §§ 1029(a)(1) and (2) is not duplicative, even though indictment referred to use of unauthorized credit card at 2 separate retail stores, where acts involved same 2 persons, same credit card, and occurred back-to-back on same day, because 2 acts charged were plainly part of single continuing scheme to defraud, which may properly be charged in single count. *United States v. Brewer* (1991, SD NY) 768 F Supp 104.

§ 1030. Fraud and related activity in connection with computers

(a) Whoever—

- (1) knowingly accesses a computer without authorization or exceeds authorized access, and by means of such conduct obtains information that has been determined by the United States Government pursuant to an Executive order, or statute, to require protection against unauthorized disclosure for reasons of national defense or foreign relations, or any restricted data, as defined in paragraph y.(1) [(y)] of section 11 of the Atomic Energy Act of 1954 [42 USCS § 2014(y)], with the intent or reason to believe that such information so obtained is to be used to the injury of the United States, or to the advantage of any foreign nation;
- (2) ~~intentionally accesses a computer without authorization or exceeds authorized access, and thereby obtains information contained in a financial record of a financial institution, or of a card issuer as defined in section 1602(n) of title 15, or contained in a file of a consumer reporting agency on a consumer, as such terms are defined in the Fair Credit Reporting Act (15 U.S.C. 1681 et seq.);~~
- (3) intentionally, without authorization, to access any computer of a department or agency of the United States, accesses such a computer of that department or agency that is exclusively for the use of the Government of the United States or, in the case of a computer not exclusively for such use, is used by or for the Government of the United States and such conduct affects the use of the Government's operation of such computer;
- (4) knowingly and with intent to defraud, accesses a Federal interest computer without authorization, or exceeds authorized access, and by means of such conduct furthers the intended fraud and obtains anything of value, unless the object of the fraud and the thing obtained consists only of the use of the computer;
- (5) intentionally accesses a Federal interest computer without authorization, and by means of one or more instances of such conduct alters, damages, or destroys information in any such Federal interest computer, or prevents authorized use of any such computer or information, and thereby—
 - (A) causes loss to one or more others of a value aggregating \$1,000 or more during any one year period; or
 - (B) modifies or impairs, or potentially modifies or impairs, the medical examination, medical diagnosis, medical treatment, or medical care of one or more individuals; or
- (6) knowingly and with intent to defraud traffics (as defined in section 1029) in any password or similar information through which a computer may be accessed without authorization, if—
 - (A) such trafficking affects interstate or foreign commerce; or
 - (B) such computer is used by or for the Government of the United States;

shall be punished as provided in subsection (c) of this section.

(b) ~~Whoever attempts to commit an offense under subsection (a) of this section shall be punished as provided in subsection (c) of this section.~~

(c) The punishment for an offense under subsection (a) or (b) of this section is—

- (1)(A) a fine under this title or imprisonment for not more than ten years, or both, in the case of an offense under subsection (a)(1) of this section which does not occur after a conviction for another offense under such subsection, or an attempt to commit an offense punishable under this subparagraph; and
- (B) a fine under this title or imprisonment for not more than twenty years, or both, in the case of an offense under subsection (a)(1) of this section which occurs after a conviction for another offense under such subsection, or an attempt to commit an offense punishable under this subparagraph; and
- (2)(A) ~~a fine under this title or imprisonment for not more than one year, or both, in the case of an offense under subsection (a)(2), (a)(3), or (a)(6) of this section which does not occur after a conviction for another offense under such subsection, or an attempt to commit an offense punishable under this subparagraph; and~~
- (B) a fine under this title or imprisonment for not more than ten years, or both, in the case of an offense under subsection (a)(2), (a)(3), or (a)(6) of this section which occurs after a conviction for another offense under such subsection, or an attempt to commit an offense punishable under this subparagraph; and
- (3)(A) a fine under this title or imprisonment for not more than five years, or both, in the case of an offense under subsection (a)(4) or (a)(5) of this section which does not occur after a conviction for another offense under such subsection, or an attempt to commit an offense punishable under this subparagraph; and
- (B) a fine under this title or imprisonment for not more than ten years, or both, in the case of an offense under subsection (a)(4) or (a)(5) of this section which occurs after a conviction for another offense under such subsection, or an attempt to commit an offense punishable under this subparagraph.

TRW CREDIT REPORT

EQUIFAX CREDIT REPORT

①

NAME	ADDRESS	CITY	STATE	ZIP	DATE	STATUS
JOHN DOE	123 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JANE DOE	456 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JOHN DOE	789 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JANE DOE	101 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JOHN DOE	202 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JANE DOE	303 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JOHN DOE	404 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JANE DOE	505 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JOHN DOE	606 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JANE DOE	707 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JOHN DOE	808 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE
JANE DOE	909 MAIN ST	ANYTOWN	CA	90210	01/01/99	ACTIVE

CREDIT HISTORY

Company Name	Account Number	Type	Open Date	Close Date	Status	Balance	Payment
ABC BANK	123456789	Checking	01/01/99		Open	\$100.00	\$100.00
DEF BANK	987654321	Savings	01/01/99		Open	\$500.00	\$500.00
GHI BANK	567890123	Checking	01/01/99		Open	\$200.00	\$200.00
JKL BANK	345678901	Checking	01/01/99		Open	\$300.00	\$300.00
MNO BANK	234567890	Checking	01/01/99		Open	\$400.00	\$400.00
PQR BANK	123456789	Checking	01/01/99		Open	\$500.00	\$500.00
STU BANK	987654321	Checking	01/01/99		Open	\$600.00	\$600.00
VWX BANK	567890123	Checking	01/01/99		Open	\$700.00	\$700.00
YZA BANK	345678901	Checking	01/01/99		Open	\$800.00	\$800.00
BCD BANK	234567890	Checking	01/01/99		Open	\$900.00	\$900.00
EFG BANK	123456789	Checking	01/01/99		Open	\$1000.00	\$1000.00

ILLEGAL ↑

==USDL==

April 9, 1993
Edward Dycs
253 Heather Crest Drive
Chesterfield, MO 63017

Dear Mr. Dycs:

On receipt of your letter requesting a customer status on the Callahan Group and found that they ceased to be active with us last June.

We have no idea where the company is or if it exists anymore. For your request I am enclosing a copy of the original request by the Callahan Group.

②

Posted: Mon, May 4, 1992 6:02 PM CDT
From: D1606
To: USIA, AIS
Subject: CALLAHAN GROUP on
INDIVIDUAL SEARCH INFORMATION

SSN: [redacted]
LAST NAME: Dycs
FIRST NAME: Edward
SUFFIX:
STREET ADDRESS: 253 Heather Crest Drive
CITY: Chesterfield
STATE: MO
ZIP: 63017
DATE OF BIRTH: [redacted]

BUSINESS SEARCH INFORMATION

BUSINESS NAME:
ADDRESS:
TELEPHONE #:

ADDITIONAL INFORMATION

SEARCHES: 100
TYPE OF REQUEST:

ILLEGAL ↑ Complaint HARR

Mr. Edward Dycs
253 Heather Crest Drive
Chesterfield, MO 63017

Dear Mr. Dycs:

This is in response to your letter of August 23, 1993. The Callahan & Gibbons Group, Inc. was asked by our client to conduct a background check on you. Enclosed is all the information we provided to our client, which includes all of the information provided to us about you by the Callahan, Inc. I refer you to the information provided to you by the Callahan, Inc. in its letter to you, a copy of which is attached.

Your letter makes reference to the "FCHA." If you are referring to the Fair Credit Reporting Act, you should be aware that the Callahan & Gibbons Group is not a consumer reporting agency and the report we submitted to our client was not a consumer report. Therefore, the Fair Credit Reporting Act is not applicable. Nonetheless, in response to your request, we are sending permission from our client to disclose the client's identity to you. Upon receipt of instructions from the client, we will notify you.

Very truly yours,

[Signature] *[Signature]*

Edward J. Dycs
253 Heather Crest Drive
Chesterfield, MO 63017
St. Charles, MO 63304

Age: 43
DOB: 2/22/49
SSN: [redacted] (listed in the state of Missouri)
Criminal History: Negative
State of Missouri, Bureau of Motor Vehicles: Subject has a valid Missouri Operators License with a clear driving record.
His wife's name is Gabrielle. ONLY in EQUIFAX Credit Report.

THE CALLAHAN & GIBBONS GROUP, INC.
THE CALIFORNIA GROUP, INC.
40 CALIFORNIA STREET, SUITE 200
SAN FRANCISCO, CALIFORNIA 94104-2000
Tel: (415) 398-1000
FAX: (415) 398-1001

October 26, 1993

Mr. Edward Dycs
253 Heather Crest Drive
Chesterfield, MO 63017

Dear Mr. Dycs:

As I anticipated in my letter of August 23, 1993 (a copy of which is attached), we have been authorized to disclose to you that our client in this matter was The House of Representatives, 4400 LBJ Freeway, Dallas, Texas 75246.

Very truly yours,

[Signature]

Enclosure

"Background check was for FBI Part 1 for what purpose?"

§604. Permissible purposes of reports

"A consumer reporting agency may furnish a consumer report under the following circumstances and no other:

"(1) In response to the order of a court having jurisdiction to issue such an order.

"(2) In accordance with the written instructions of the consumer to whom it relates.

"(3) To a person which it has reason to believe:

"(A) intends to use the information in connection with a credit transaction involving the consumer on whom the information is to be furnished and involving the extension of credit to, or review or collection of an account of, the consumer; or

"(B) intends to use the information for employment purposes.

"(C) intends to use the information in connection with the underwriting of insurance involving the consumer; or

"(D) intends to use the information in connection with a determination of the consumer's eligibility for a license or other

benefit granted by a governmental instrumentality required by law to consider an applicant's financial responsibility or status; or

"(E) otherwise has a legitimate business need for the information in connection with a business transaction involving the consumer.

§606. Disclosure of investigative consumer reports

"(a) A person may not procure or cause to be prepared an investigative consumer report on any consumer unless—

"(1) it is clearly and accurately disclosed to the consumer that an investigative consumer report including information as to his character, general reputation, personal characteristics, and mode of living, whichever are applicable, may be made, and such disclosure (A) is made in a writing mailed, or otherwise delivered, to the consumer, not later than three days after the date on which the report was first requested, and (B) includes a statement informing the consumer of his right to request the additional disclosures provided for under subsection (b) of this section; or

"(2) the report is to be used for employment purposes for which the consumer has not specifically applied.

"(b) Any person who procures or causes to be prepared an investigative consumer report on any consumer shall, upon written request made by the consumer within a reasonable period of time after

receipt by him of the disclosure required by subsection (a)(1), shall make a complete and accurate disclosure of the nature and scope of the investigation requested. This disclosure shall be made in a writing mailed, or otherwise delivered, to the consumer not later than five days after the date on which the request for such disclosure was received from the consumer or such report was first requested, whichever is the later.

"(c) No person may be held liable for any violation of subsection (a) or (b) of this section if he shows by a preponderance of the evidence that at the time of the violation he maintained reasonable procedures to assure compliance with subsection (a) or (b).

§607. Compliance procedures

"(a) Every consumer reporting agency shall maintain reasonable procedures designed to avoid violations of section 606 and to limit the furnishing of consumer reports to the purposes listed under section 604. These procedures shall require that prospective users of the information identify themselves, certify the purposes for which the information is sought, and certify that the information will be used for no other purpose. Every consumer reporting agency shall make a reasonable effort to verify the identity of a new prospective user and the uses certified by such prospective user prior to furnishing such user a consumer report. No consumer reporting agency may furnish a consumer report to any person if it has reasonable grounds for believing that the consumer report will not be used for a purpose listed in section 604.

"(b) Whenever a consumer reporting agency prepares a consumer report it shall follow reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates.

§612. Unlawful use of consumer reports

"(a) Whenever credit or insurance for personal, family, or household purposes, or employment involving a consumer is denied or the charge for such credit or insurance is increased either wholly or partly because of information contained in a consumer report from a consumer reporting agency, the user of the consumer report shall so advise the consumer against whom such adverse action has been taken and supply the name and address of the consumer reporting agency making report.

"(b) Whenever credit for personal, family, or household purposes involving a consumer is denied or the charge for such credit increased either wholly or partly because of information obtained from a person other than a consumer reporting agency bearing on the consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living, the user of such information shall, within a reasonable period of time upon the consumer's written request for the reasons for such adverse action received within sixty days after learning of such adverse action, disclose the nature of the information to the consumer. The user of such information shall clearly and accurately disclose to the consumer his right to make such written request at the time such adverse action is communicated to the consumer.

"(c) No person shall be held liable for any violation of this section if he shows by a preponderance of the evidence that at the time of the alleged violation he maintained reasonable procedures to assure compliance with the provisions of subsections (a) and (b).

§616. Civil liability for willful noncompliance

"Any consumer reporting agency or user of information which

fully fails to comply with any requirement imposed under this title with respect to any consumer is liable to that consumer in an amount equal to the sum of—

"(1) any actual damages sustained by the consumer as a result of the failure;

"(2) such amount of punitive damages as the court may allow; and

"(3) in the case of any successful action to enforce any liability under this section, the costs of the action together with reasonable attorney's fees as determined by the court.

§617. Civil liability for negligent noncompliance

"Any consumer reporting agency or user of information which is negligent in failing to comply with any requirement imposed under this title with respect to any consumer is liable to that consumer in an amount equal to the sum of—

"(1) any actual damages sustained by the consumer as a result of the failure;

"(2) in the case of any successful action to enforce any liability under this section, the costs of the action together with reasonable attorney's fees as determined by the court.

§618. Jurisdiction of courts; limitation of actions

"An action to enforce any liability created under this title may be brought in any appropriate United States district court without regard to the amount in controversy, or in any other court of competent jurisdiction, within two years from the date on which the liability arises, except that where a defendant has materially and willfully misrepresented any information required under this title to be disclosed to an individual and the information so misrepresented is material to the establishment of the defendant's liability to that individual under this title, the action may be brought at any time within two years of discovery by the individual of the misrepresentation.

§619. Obtaining information under false pretenses

"Any person who knowingly and willfully obtains information on a consumer from a consumer reporting agency under false pretenses shall be fined not more than \$5,000 or imprisoned not more than one year, or both.

§620. Unauthorized disclosures by officers or employees

"Any officer or employee of a consumer reporting agency who knowingly and willfully provides information concerning an individual from the agency's files to a person not authorized to receive the information shall be fined not more than \$5,000 or imprisoned more than one year, or both.

§621. Administrative enforcement

"(a) Compliance with the requirements imposed under this title shall be enforced under the Federal Trade Commission Act by the Federal Trade Commission with respect to consumer reporting agencies and all other persons subject thereto, except to the extent that enforcement of the requirements imposed under this title is specifically committed to some other government agency under some

Updated Credit Profile Disclosure

See Comment below... Full identification information, including your Social Security Number is needed to check any disputed items

TRN

SSN

INQUIRY INFORMATION

TCRC 00D2 3499970

DYCK EDWARD

PAGE 1 DATE 10/02/92 TIME 22:46:15 PORT A909 H/V 805 IDENTIFICATION NUMBER

3-87 EDWARD I DYCK

10-Y

SSN

YOB

ACCOUNT PROFILE			SUBSCRIBER NAME/COURT NAME			SUBSCRIBER #	ASSN. CODE	ACCOUNT NUMBER/DOCKET		PAYMENT PROFILE
POS	NON	DES	STATUS COMMENT	STATUS DATE	DATE OPENED	TYPE	TERMS	BALANCE	BALANCE DATE	AMOUNT DUE
A			CURR ACCT	COMPANY		CHG	1 REV	HIBAL		NNNNN-NNN
								LASTPAY		
A			CURR ACCT			CRC	1 REV	HIBAL		CCCCCCCCC
								LASTPAY		CC-CCCCC
A			CURR ACCT			CRC	1 REV	LIMIT		CCCCCCCCC
						SCH	MONTH PAY	LASTPAY		CCCCCCCCC
A			CURR ACCT			CRC	1 REV	LIMIT		CCCCNNNCC
						SCH	MONTH PAY	LASTPAY		CNCCCCCNC
A			CURR ACCT			3276502	2 REV	LIMIT		CCCCCNCNC
						SCH	MONTH PAY	LASTPAY		CNCCCCCCC
A			CURR ACCT			CHG	1 REV	LIMIT		NNNNNNNNN
A			CURR ACCT			CHG	1 UNK	HIBAL		NNNCNNNNN
								LASTPAY		NNNCNNNNN
A			CURR ACCT			CHG	1 REV			NNNNN-NNN
										NNNNNN-NN
A			SEARS			2312576				
			INQUIRY	7-24-92		QST				
A			U S DATALINK EMP SVC			3988086				
			INQUIRY	5-05-92		A/U				
END -- TRW										

This report is based on the identifying information supplied by you. If you did not supply us with your full name, addresses for the past five years, social security number and year of birth, this report may not be complete.

CONFIDENTIAL

4

Please address all future
correspondence to this address

CSC ST LOUIS
652 NORTH BELT E 133
BOX 674401
HOUSTON, TX 77267

EDWARD J DYCK

DATE 10/01/92
SOCIAL SECURITY NUMBER
DATE OF BIRTH
SPOUSE

CREDIT HISTORY

Company Name	Account Number	Where Acct.	Date Opened	Months Re- viewed	Date Of Last Activity	High Credit	Terms	Items as of Date Reported			Date Reported
								Balance	Paid Due	Status	
SV BK AMOUNT IN H/C COLUMN IS CREDIT LIMIT										R1	08/92
SV BK AMOUNT IN H/C COLUMN IS CREDIT LIMIT										R1	08/92
HU AMOUNT IN H/C COLUMN IS CREDIT LIMIT										R1	08/92
										R1	08/92
CD										R1	09/92
BNKCRD AMOUNT IN H/C COLUMN IS CREDIT LIMIT										R1	01/89

***** COMPANIES THAT REQUESTED YOUR CREDIT HISTORY *****

10/01/92 EQUIFAX
09/01/92 EQUIFAX
07/08/92 PRM CITI PRVS
05/15/92 PRM AMER EXP
04/17/92 PRM CITI GOLD

09/15/92 PAID COPY
07/28/92 PRM NCNB BK CD
07/01/92 PRM AMER EXP
05/07/92 ORIX LSNG
04/14/92 PRM UMB-USA



24043591409



August 19, 1993

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

Dear Mr. Dyck,

In response to your letter of August 13, the Callahan Group used our gateway to obtain an "address update" product. The only information given was your name and address.

I am enclosing our brochure which lists the more frequently used services our gateway offers.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bill Jones".

Bill Jones, President
U S Datalink, Inc.

BJ/ch

U S DATALINK, INC.

(800) 527-7930 • 6711 BAYWAY DRIVE • BAYTOWN, TEXAS 77520

24043591410



July 13, 1993

Edward I. Dyck
253 Heather Crest Drive
Chesterfield, Missouri 63017

Dear Mr. Dyck,

I am in receipt of your letters. I did not answer the first letter because I assumed you were aware of the circumstance and outcome of the FTC investigation concerning credit file inquiries ordered on individuals of which you were included.

Briefly, an inquiry was made on several people by a client of ours for the purpose of updating addresses. This credit bureau product does not include any credit information as such is defined by the Fair Credit Reporting Act and thus does not require a "permissible purpose." The USDL client who made the inquiry was the Callahan Group of 433 California Street, Suite 800, San Francisco, California 94104.

This information, Mr. Dyck, was made available to all interested parties by US Datalink at the time of the first inquiries. Neither US Datalink nor the Callahan Group has ever hidden or denied the activity simply because no violation of the Fair Credit Reporting Act or any other law or policy was committed. You may be interested to know, however, that since that time much in the way of policy concerning credit has changed in ways that undoubtedly would make you, as a concerned consumer, feel more comfortable.

I hope this letter fulfills your request, but if there are other questions, feel free to call my office at the number given below.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bill Jones".

Bill Jones, President
US Datalink, Inc.

U S DATALINK, INC.

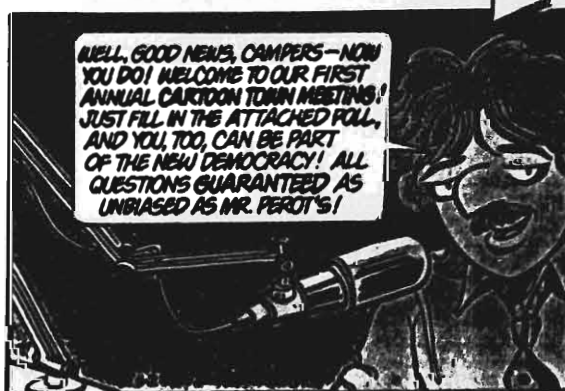
(800) 527-7930 • 6711 BAYWAY DRIVE • BAYTOWN, TEXAS 77520

24043591411

ST. LOUIS POST-DISPATCH, SUNDAY, MAY 2, 1993

DOONESBURY

BY G. B. TRUDEAU



Please check off the appropriate boxes.

1. Do you think the White House should continue to kowtow to a third-place, on-again, off-again, presidential wannabe?

No ☐ Yes ☐ Not sure ☐

2. Do you think Congress should listen to lectures about "special interests" from someone who was once the U.S.'s largest individual contributor to politicians, 12 of whom later voted to give him a special \$15 million tax break?

No ☐ Yes ☐ Not sure ☐

3. Do you think anyone should listen to a egomaniacal, bigoted conspiracy-theorist capable of investigating not only his enemies, but his own supporters and family?

No ☐ Yes ☐ Not sure ☐

Send to: Cartoon Town Meeting, c/o Universal Press Syndicate
4900 MAIN STREET, KANSAS CITY, MO 64112

WE'LL BE PRINTING THE POLL RESULTS IN THIS SPACE NEXT MONTH, SO ACT NOW! LET YOUR GOVERNMENT KNOW HOW YOU FEEL ON THESE IMPORTANT NATIONAL ISSUES!



Perot
Investigations

had given to all Ohio leaders in August to check into their credit reports that this sham was made public. Perot son-in-law and attorney Clayton Mulford would admit the investigations on September 30, 1992 saying they were undertaken because certain people like Yane and Arnebeck were believed to be "security risks." The Consumer Affairs and Coinage Subcommittee of the House Banking, Finance and Urban Affairs Committee would begin an October, 1992 inquiry. Credit inquiries from normally legitimate credit users would show up on Perot volunteer credit histories in different parts of the country and the users would plausibly deny that they had anything to do with it, producing suspicions of fraudulent use of credit access codes. Attorneys at the Federal Trade Commission would confirm in the first stage of their inquiry that one to two dozen matches had been made to possibly illegal credit inquiries on the records of people nationwide whose only connection to each other was their attempt to help Ross Perot. By Election Day, the Secret Service would be called in by a major credit reporting agency, Equifax, to assist it in identifying illegal computer hacking operations, some of which a Dallas volunteer, one Robert Penn (interviewed by CBS NEWS, October 15th) claimed he witnessed being performed at the Perot Headquarters. If it had been a proper credit inquiry, the

guy would not have needed counsel. Rocheck had reacted properly. He said he did a consumer report and he identified his client. He even read the entire report to Yane on the phone, but O'Connell was taking cover.

When Sweet called back, O'Connell said he had to claim "privilege" and refused to identify his client. O'Connell stopped talking to anyone and refused his mail. EQUIFAX, the huge credit reporting agency, terminated him as a client for his refusal to cooperate with their own internal investigation. Sweet contacted a former Hauppauge, Long Island, policeman who knew the territory. The report came back that O'Connell wasn't very well known, might be a former NYC cop.

On the same April day O'Connell had hit Yane's credit records, he had gone into Arlene Darrow's too. Yane shared Arlene's home, and, as a retired businessman with no children, gave willingly of his time on many days to care for her grandchild whom he dearly loved. But Arlene Darrow's name never was given to any Perot people until late in May, when Yane proposed that she stand up for Ohio at Orlando, Florida during the Perot Satellite Party. By April 23, O'Connell had already done his real estate search or he would never have known Darrow's name.

As each day went by, stories came back from the other states. Larry Way, the county coordinator in Maryland who had been kicked out by two security guards sent in by Callahan and Gibbons, had been hit by O'Connell. Kevin Laughlin in Missouri was another. Tom O'Neil in New Jersey, Cliff Arnebeck in Columbus. There was a list of fourteen Missouri volunteers and eleven of them had been hit by ORIX LEASING COMPANY of Portland Oregon, but ORIX, in the furniture leasing business, categorically denied ever doing it. This prompted EQUIFAX to change the ORIX access codes and call in the Secret Service, which investigates illegal computer hacking. Another company, U.S. Datalink, had accessed some credit reports through TRW and when TRW pressed hard, U.S. Datalink identified its client. The Callahan and Gibbons Group, paid upwards of \$100,000 by the Perot campaign

The loop was closing in on Ross Perot. The evidence was piling up. Michael Isikoff in The Washington Post did a story syndicated nationwide on October 1st, the day Perot announced, which contained Perot attorney and son-in-law Mulford's admission of "background checks" into volunteers. Steven Holmes in The New York Times received the same admissions from Mulford. The story ran on page one in the Times and in many of its news service papers,

24043591413

Gore Urges Bush to Sign Bill on Nuclear Waste

By EDWIN CHEN
TIMES STAFF WRITER

PERNADO, Ohio—Sen. Al Gore spent Wednesday warming up for what Democratic presidential nominee Bill Clinton says will be his task in a Clinton-Gore Administration, leading a 100-day drive to pass a legislative agenda.

Gore has pressed President Bush this week on a wide range of issues on the legislative front, burning from cable television regulation to nuclear waste cleanup.

At a campaign stop in Ohio, the Tennessee senator urged the President not to veto legislation designed to enable states to hold federal weapons production facilities to the same environmental standards applied to private corporations.

Gore spoke during a meeting with several families who have been forced from their homes because of radioactive contamination from the Department of Energy's Hanford Materials Production Center, a processor of uranium for nuclear bombs.

They were joined by former Democratic congressman Tom Luken of Ohio, who called the contamination of soil and drinking water in the region "a betrayal by the government" that was compounded by "cover-up and lies."

In calling for Bush to sign the Federal Facilities Compliance Act, which Congress passed last week, Gore accused the President of having backed such a law during the 1988 presidential campaign, only to reverse his position five months after taking office.

"The so-called environmental President has left a trail of broken promises all across the country," Gore said.

The author of the best-selling book, "Earth in the Balance," Gore has made environmental protection a hallmark of his campaign, providing a counterweight to Clinton, whose own environmental record as governor of Arkansas has been less than sterling.

"I hope this visit today will result in Bush being embarrassed enough to sign that legislation," Gore said.

Perot Panel Investigated Some State Coordinators, Volunteers

By MICHAEL ISIKOFF
THE WASHINGTON POST

DALLAS—Ross Perot's presidential petition committee used a San Francisco law firm and private detective agency to investigate the backgrounds of state coordinators and other Perot volunteers in some states, an official with the Perot Petition Committee confirmed Wednesday.

During a period when Perot was publicly denying allegations that he frequently used private detectives to investigate business rivals, his committee was paying more than \$78,000 to the Callahan & Gibbons Group, a law firm that specializes in private investigations and other security-related matters, according to campaign finance reports and recent billings reviewed by the campaign officials.

Perot's campaign reports list the payments—the first \$38,000 of which were included for August—as "legal fees." But Clayton Mulford, general counsel to the Perot Petition Committee, said in an interview that the Callahan & Gibbons Group provided a variety of services to the committee, including the deployment of security at some local Perot for President offices, a detailed study of drug policy and "background checks" and credit histories of some state coordinators to determine if they had criminal records or were unsuitable to handle large sums of money.

After the Perot Petition Committee's payments to Callahan & Gibbons were first reported Tuesday night by CBS News, Mulford agreed Wednesday to provide some details about the relationship. He said the firm was hired, without Perot's knowledge, during a chaotic period last spring when thousands of citizens began flocking to Perot petition offices and in some cases got into heated disputes over who should serve as local or state coordinators.

"We had ex-cons, ex-con men, people who were swindlers and had been convicted of that," Mulford said. "For us, it was a nightmare."

The committee's hiring of Callahan & Gibbons fueled new charges Wednesday from former Perot volunteers that he had engaged in a "cover-up" of his involvement

and purged any potential dissenters who might object to his running for the presidency. While publicly portraying his organization as a grass-roots, "bottom up" effort, Perot was using private investigators "to purposely discredit people and get rid of them," said Bill Sweet, the former Perot coordinator in Ohio who said he has been researching credit investigations conducted on ex-Perot coordinators across the country.

The committee first turned to Callahan & Gibbons to provide security guards in its Frederick, Md., office after a former coordinator allegedly threatened other workers there. Later, amid concerns about possible "financial shenanigans" in some state offices, the committee asked the firm to investigate state coordinators in Illinois, New Jersey, Ohio and a few other states, Mulford said.

"In certain instances, legal background checks were conducted," Mulford said. "If somebody would have asked me if this was a good idea, I don't think I would have said yes."

In at least one case, he said, the firm found that a state coordinator had an arrest record but no convictions. The coordinator was among several who were removed by Dallas headquarters.

Mulford said that Tom Barr, a prominent New York lawyer who was serving as an informal legal adviser to the committee, made the decision to hire Callahan & Gibbons and Perot was not informed.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JUNE 14, 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

Dear Mr. Dyck:

This acknowledges receipt of your letter on June 13, 1994, inquiring about a possible violation of the Federal Election Campaign Act of 1971, as amended ("the Act").

The Federal Election Commission has jurisdiction over the Act and Chapters 95 and 96 of Title 26, United States Code. After careful review of your correspondence, we have determined that your complaint does not state any acts which appear to constitute a violation under our jurisdiction. If you feel your complaint does constitute a violation of the Act or Chapters 95 or 96 of Title 26, United States Code, the Commission will be glad to review the matter again.

If you have any questions, please contact me at (202) 219-3410.

Sincerely,

Retha Dixon
Docket Chief

cc: The Perot Petition Committee

24043591416

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE UNIT

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

AUG 23 9 09 AM 1994

Office of General Counsel
The Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
AUG 23 9 14 AM '94

Dear Sir:

Reference my complaint against The Perot Petition Committee
dtd June 7, 1994 (enclosed).

I submit the additional new evidence from the deposition from
John Callahan that clearly states that Russ Melbye (agent for Perot)
requested the background investigation of electors and volunteers
in Missouri and other states without permission of said volunteers.
This is a gross invasion of privacy. See tab A. We need to track down
North American Advisory of Illinois (pg 4).

Sincerely,

Edward Dyck

24043591417

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017
314-878-0422

June 7, 1994

Office of General Counsel
The Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

Subject: Complaint against The Perot Petition Committee aka Perot '92
(7616 LBJ Freeway, Ste 727, Dallas, TX 75251) for unlawfully
investigating volunteers

Dear Sir:

On February 20, 1992, Ross Perot was interviewed on "Larry King Live." During the interview, Perot explained that he would run for president as an independent candidate if the people who wanted him to run organized themselves, and on their own registered him on the presidential ballot in all fifty states. I viewed this broadcast and decided to volunteer my assistance in the effort to place Ross Perot on the presidential ballot in Missouri. As there was a shortage of volunteers at the time, I also volunteered to be an elector. I also supported Ross Perot by selling Perot bumper stickers, buttons, and t-shirts. I registered this effort with the FEC. The purpose was to promote Ross Perot.

Mark Blahnik, acting as an agent of Perot (and being paid by The Perot Group--a corporation) hired Callahan & Gibbons in April and May of 1992 to assist with "security" of the petition drive. The actions taken by Callahan & Gibbons included, but were not limited to, investigating volunteers on Perot's petition drive. They were paid around \$100,000 to conduct these investigations by Perot through the Perot Petition Committee.

On May 5, 1992, Callahan & Gibbons obtained information on me from TRW through U.S. Datalink, an information broker in Baytown, TX. Ross Perot, The Perot Petition Committee, Callahan & Gibbons and U.S. Datalink did not intend to employ, promote, extend credit to, sell insurance to, or transact business with myself. The information was obtained without my authorization or knowledge.

On May 7, 1992, an access code belonging to Orix Credit Alliance, a furniture leasing company in Portland, Oregon, was used to obtain from Equifax consumer reports of at least eleven volunteers on Perot's petition drive. After conducting its own investigation, Equifax concluded that no one at Orix was responsible for obtaining these consumer reports. It is belief from the information I have that my full credit report (to include bank accounts with balance and account number and credit cards with balance and account numbers) were obtained from Equifax by means of the Orix Credit Alliance access code. Callahan & Gibbons, acting as agent of Ross Perot, used Orix Credit Alliance's access code to obtain my full credit report from Equifax. Ross Perot, The Perot Petition Committee, and Callahan & Gibbons did not intend to employ, promote, extend credit to, sell insurance to, or transact business with me. The information was obtained without my authorization or knowledge.

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The investigations conducted by Perot and his agents became a matter of public inquiry in the fall of 1992. The national media reported that Clay Mulford, legal counsel to the Perot Petition Committee, admitted that the Perot Petition Committee did background checks and obtained credit information on various volunteers. Perot or representatives of the Perot Petition Committee made public statements justifying the investigations based on allegations that volunteers were misappropriating campaign funds or had criminal records. These statements were untrue about me and the other volunteers in Missouri. These false allegations cast aspersions on my character and placed me in a false light.

I was a financial advisor, in which personal reputation is critical. As a result of the Perot Petition Committee's conduct, I suffered damage to my professional reputation, I received threats by phone and mail, and experienced depression, anxiety, humiliation, and other types of mental and emotional distress.

I make the following allegations:

- 1) I charge Ross Perot, the Perot Petition Committee, and Mark Blahnik (Perot's agent) with violation of the Fair Credit Reporting Act, 15 U.S.C. SS 1681a-1681t. This prohibits any person from knowingly and willfully obtaining information on a consumer from a credit reporting agency under false pretenses. Perot, the Perot Petition Committee, Mark Blahnik and-or through other agents, obtained information on myself and other Missouri volunteers from consumer reporting agencies under false pretenses. Upon information and belief Callahan & Gibbons obtained consumer reports on myself and other Missouri volunteers from Equifax by means of an access code, and such unauthorized use of another's access code to obtain a consumer report from a consumer reporting agency is a violation of the Fair Credit Reporting Act. Callahan & Gibbons was acting as an agent or subagent of the Perot Petition Committee and Ross Perot. Mark Blahnik and the Perot Petition Committee were acting as agents of Ross Perot. A principal is held vicariously liable for the torts of its agents when the statements or acts constituting those torts are committed within the scope of the authority of such agents. The acts committed in obtaining information about me from Equifax under false pretenses were committed within the scope of their authority as agents of Ross Perot.
- 2) I charge Ross Perot, the Perot Petition Committee, and its agents with gross invasion of my privacy. My consumer report from Equifax in response to the Orix request on May 7, 1992 contained information which was of a personal and private nature. I have a right to keep that information private, as recognized by federal law which strictly limits the purposes for which Equifax may disclose my information. Callahan & Gibbons obtained private information on me for purposes other than those permitted by statute. Upon information and belief that Callahan & Gibbons, the Perot Petition Committee and Ross Perot obtained private information on me by means of deceit and false pretenses, and without a purpose recognized by the Fair Credit Reporting Act, in an objectionable Manner. By their use of the Orix access code to obtain my consumer report constituted an

intrusion upon my seclusion and constituted an invasion of my privacy. As a result, I have suffered mental and emotional distress, anxiety, and other damages.

3) I charge Ross Perot, the Perot Petition Committee, and its agent Russ Melbye with False Imprisonment. On May 19, 1992, I was intentionally restrained in a meeting room at the Perot Petition Drive offices on Mason Road against my will. During the period of my detention, I did not remain in that meeting room willingly or voluntarily. The detention and restraint of myself was unlawful, in that I had Russ Melbye (acting as agent for Ross Perot) had no valid authority or right to detain or restrain me in such a manner. I knew the detention and restraint was unlawful, and wrongful. Russ Melbye was acting as agent or subagent to Ross Perot and the Perot Petition Committee. A principal is held vicariously liable for the torts of its agents, including false imprisonment, when the statements or acts constituting those torts are committed within the scope of the authority of such agent. The acts of Melbye in unlawfully restraining and detaining me against my will were committed within the scope of his authority as agent of Ross Perot. As a result of my false imprisonment I experienced mental and emotional distress and other damages.

4) I charge Ross Perot with negligence. Perot had a duty to exercise reasonable care in ensuring that his agents' conduct of their activities, including those complained of herein, did not invade the privacy of myself, or cause me harm. This duty included taking reasonable actions to ensure that his agents did not violate federal statutes specified herein or the common law rights and privileges available to myself and upon which I had a right to rely. Perot failed to exercise reasonable control over his agents or to take any action to prevent the events complained of herein from occurring. Perot knew or should have known that in light of the nature of the activities undertaken by his agents the result of his failure to exercise his right to control his agents would result, and in fact did, in the illegal conduct and injury to myself as described herein. As a result of Perot's negligence, I suffered mental and emotional distress, anxiety, and other damages.

I make these charges against:

Ross Perot
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

The Perot Petition Committee
Mike Poss, Treasurer
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

Mark Blahnik
The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

Russ Melbye
The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

or
3852 Dalston Lane
Plano, TX 75023

24043591420

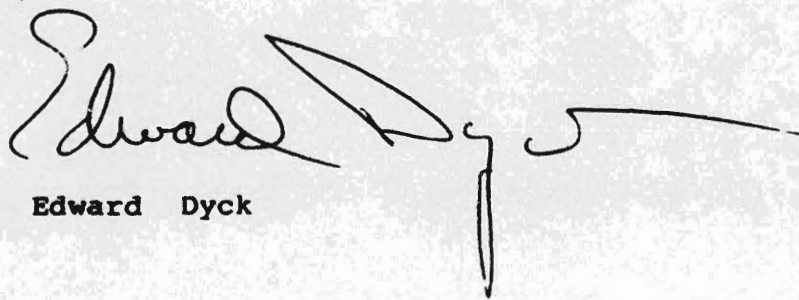
Supporting documentation is enclosed. Other Missouri
volunteers who experienced what I did are:

Kevin Laughlin
12384 Shoreridge Drive
Apartment E
Maryland Heights, MO 63043
314-275-8393

Carrie Alspaw
1402 Southgate Drive
St. Charles, MO 63304
314-928-5020

also,

Larry Way
1734 Marker Rd.
Middleton, MD 21769
301-371-6858

24043591421

Edward Dyck

Subscribed and sworn before me on this 8th day of June 1994.

MARTINE F. LADIG
Notary Public—Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Nov. 22, 1996

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MARK DOTZLER,

Plaintiff,

v.

ROSS PEROT, et al.

Defendants.

Civil Action No. 4:94CV888CAS

AFFIDAVIT OF JOHN J. CALLAHAN

STATE OF CALIFORNIA)

) ss.

COUNTY OF SAN FRANCISCO)

JOHN J. CALLAHAN, being duly sworn, deposes and says:

1. I have read and understand the allegations contained in the Complaint in the above-captioned action.

2. At the time of the events alleged in the Complaint, I was Secretary-Treasurer of The Callahan & Gibbons Group, Inc. ("Callahan & Gibbons"), a small private investigations firm with four (4) employees. I submit this affidavit in support of Callahan & Gibbons' motion to dismiss Count I and Count VIII of the Complaint for lack of personal jurisdiction over Callahan & Gibbons.

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COMMISSION
OFFICE OF GENERAL
COUNSEL

AUG 23 9 14 AM '94

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Lack of Any General Contacts with the State of Missouri

3. Callahan & Gibbons is a California corporation with its principal place of business in San Francisco, California. It has no other offices.

4. Callahan & Gibbons is not licensed or authorized to do business in the State of Missouri; it has no agent for service of process in the State of Missouri; and it maintains no bank accounts (or other assets), offices or telephone listings in the State of Missouri.

5. Callahan & Gibbons does not advertise in the State of Missouri. Nor does it provide services in the State of Missouri or have any agents, employees, or corporate officers in the State of Missouri to solicit or promote sales of its services. Callahan & Gibbons has never had an employee based in or operating out of the State of Missouri and has never had a Missouri client.

6. Callahan & Gibbons does not have an interest in, use or possess any real property in the State of Missouri.

7. Callahan & Gibbons has never made or entered into any contract within the State of Missouri, including any contract to insure or to act as surety for, or on, any person, property, risk, contract, obligation, or agreement located, executed, or to be performed in the State of Missouri; or any contract to supply goods, food, services or manufactured products in the State of Missouri.

24043591424

8. Callahan & Gibbons has never derived any revenue from services, food, or manufactured products used or consumed in the State of Missouri.

Lack of Any Contacts with the State of Missouri Relating to Allegations of The Complaint

9. In February or March of 1992, Callahan & Gibbons agreed to assist the Perot Petition Committee in the State of Texas with certain matters such as physical security at a few volunteer sites. None of those sites was located in Missouri.

10. In early May of 1992, I received a telephone call from Russ Melbye, of the Perot Petition Committee in Dallas, Texas. In the telephone call to me, Mr. Melbye requested that Callahan & Gibbons conduct background checks on several Perot presidential electors from the State of Missouri, including Carrie Alspaw, Mark Dotzler, Edward Dyck and Kevin Laughlin.¹

11. These checks consisted of verifying the names and addresses given by the electors and conducting searches of the public court records for civil and criminal matters involving each elector.

12. I agreed to do the checks, and Mr. Melbye gave me the names and addresses of the electors.

13. At Callahan & Gibbons' office in San Francisco, I began the checks by verifying the names and addresses that Mr. Melbye gave me through use of a computer service provided by U.S.

¹Mr. Melbye also requested background checks on a group of Perot electors from another state.

Datalink. The service provided current addresses and address histories for individuals and sometimes a social security number.

14. After I had verified the list of names and addresses, I telephoned North American Advisory, a private investigations firm in the State of Illinois. I told North American that I would send North American the information I had on the Missouri electors, and instructed the firm to search relevant public civil and criminal court records for any actions involving these electors. I also instructed North American to look for any tax liens. I did not instruct North American to obtain any consumer report, consumer credit report, or any consumer information on plaintiffs. Within a week or two, North American telecopied the results of its undertakings to me, which indicated that no actions or liens involving any of these people had been found. The report also included information that North American had gotten through a search of the public records of the State of Missouri, Bureau of Motor Vehicles. North American provided Callahan & Gibbons with no information other than that gathered from public records as indicated hereinabove.

15. Mr. Melbye did not ask Callahan & Gibbons for a consumer report, consumer credit report or any consumer information on Dotzler, Laughlin, Dyck or Alspaw, and Callahan & Gibbons did not seek, nor did it receive, obtain or provide to the client (or anyone else), a consumer report, consumer credit report or any type of consumer information on Dotzler, Laughlin, Dyck or Alspaw from any source, including TRW, Equifax or U.S. Datalink.

24043591426

16. Neither I (nor anyone else at Callahan & Gibbons) used, attempted to use or even considered using Orix Credit Alliance's access code for any purpose, including obtaining any type of consumer information with respect to Dotzler, Laughlin, Dyck or Alspaw. At the time of these events, I had never heard of Orix Credit Alliance and my only knowledge of Orix consists of what I have read in the Complaint.

17. On May 22, 1992, I telecopied a report on the Missouri electors from my office in the State of California to Mr. Melbye in the State of Texas. The report contained the information I had obtained through the U.S. Datalink service sitting at a computer in my office in the State of California and a summary of the information North American had sent to me. (A true and accurate copy of the May 22, 1992 report is attached hereto and incorporated by reference as Exhibit 1.) After telecopying Mr. Melbye the May 22, 1992 report, I did not hear from nor speak to Mr. Melbye or anyone else at the Perot Petition Committee again on this matter, and Callahan & Gibbons did nothing further with respect to Dotzler, Laughlin, Dyck, Alspaw or the other Missouri electors.

18. Callahan & Gibbons' services with respect to the Missouri electors were solicited by Russ Melbye, who is not a Missouri resident, and all negotiations and discussions relevant to Callahan & Gibbons' engagement occurred on telephone calls between California and Texas or California and Illinois.

19. Callahan & Gibbons did not send any information or its resulting report into the State of Missouri.

20. Callahan & Gibbons made no telephone calls into the State of Missouri and received no telephone calls from Missouri.

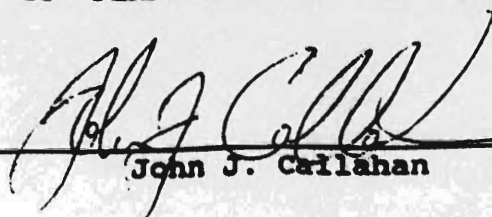
21. Callahan & Gibbons sent no written correspondence into the State of Missouri and received no written correspondence from Missouri residents or anyone in the State of Missouri.

22. Callahan & Gibbons sent no money into the State of Missouri and received no money from Missouri sources or anyone in the State of Missouri.

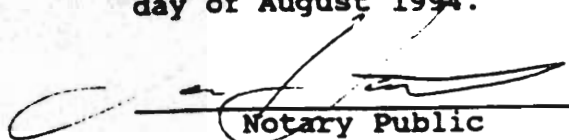
23. None of Callahan & Gibbons' employees, agents, etc., set foot in the State of Missouri in relation to the causes of action alleged against Callahan & Gibbons in the Complaint.

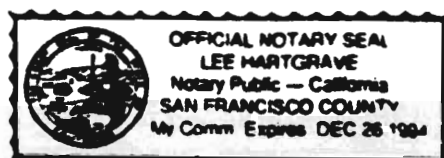
24. Callahan & Gibbons had no knowledge that any of the information gathered by it would be used by any resident of the State of Missouri or for any improper purpose in the State of Missouri.

I DECLARE UNDER PENALTY OF PERJURY THAT THE ABOVE AND
FOREGOING IS TRUE AND CORRECT.


John J. Callahan

Sworn to before me this ____
day of August 1994.


Notary Public



DSL@FL.KCM/mas

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05/22/92

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C. & G. GROUP

0001

ACTIVITY REPORT

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CONNECTION ID

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05/22 14:11

USAGE TIME

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PAGES

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24043591429



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUGUST 24, 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

Dear Mr. Dyck:

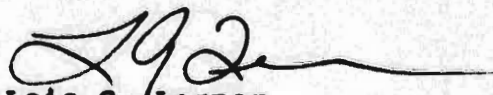
This acknowledges receipt of your most recent letter dated August 19, 1994, inquiring about a possible violation of the Federal Election Campaign Act of 1971, as amended ("the Act").

As we explained to you in our letter dated June 14, 1994, the Federal Election Commission has jurisdiction over the Act and Chapters 95 and 96 of Title 26, United States Code, which involves the financing of federal election campaigns. After careful review of your correspondence, we have determined that your complaint, involving the investigation of Perot volunteers and invasion of privacy, does not state any acts which appear to constitute a violation under our jurisdiction.

If you have any questions, please contact Maura Callaway at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

cc: Perot Petition Committee

24043591420

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COMMISSION
OFFICE OF GENERAL
COUNSEL

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

August 27, 1994

11 07 AM '94

SEP 32 11 56 AM '94

MUR 3963

Lois Lerner
Associate General Counsel
Federal Election Commission
Washington D.C. 20463

SEP 1 12 05 PM '94

RECEIVED
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COMMISSION
OFFICE OF GENERAL
COUNSEL

Dear Sir:

Thank you for your reply dated August 24, 1994 (enclosed).
In your reply you answered two of my three charges.

Your answer to my charges that The Perot Petition
Committee investigated volunteers and invaded their privacy
"does not appear to constitute a violation under your
jurisdiction." My answer to you is that this country will
have serious problems in the next Presidential Election
now that "investigating" anybody and everybody is fair.

But what about my third charge? That the Perot Petition
Committee was using corporate employees (paid for by The Perot
Group) to run it's campaign? I know for a fact from reading
FEC literature that this is illegal for the Republicans and
Democrats? Is Perot exempt?

Sincerely,

Edward Dyck

24043591431



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEPTEMBER 9, 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: MUR 3963

Dear Mr. Dyck:

This letter is in response to your August 27, 1994, letter. In your letter, you refer to allegations that the Perot Petition Committee used corporate employees paid by the Perot Group to run the campaign. Such allegations were not clearly evident in your previous letters of June 7, 1994 and August 19, 1994.

These allegations relate to the earlier complaint which you filed with the Federal Election Commission on May 11, 1994 and which we have numbered MUR 3963. Therefore, your previous correspondence will be added to the file in MUR 3963.

You will be notified as soon as the Commission takes final action in MUR 3963.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

24043591432



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20561

SEPTEMBER 9, 1994

9.13.94
EDP

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: MUR 3963

Dear Mr. Dyck:

This letter is in response to your August 27, 1994, letter. In your letter, you refer to allegations that the Perot Petition Committee used corporate employees paid by the Perot Group to run the campaign. Such allegations were not clearly evident in your previous letters of June 7, 1994 and August 19, 1994.

These allegations relate to the earlier complaint which you filed with the Federal Election Commission on May 11, 1994 and which we have numbered MUR 3963. Therefore, your previous correspondence will be added to the file in MUR 3963.

You will be notified as soon as the Commission takes final action in MUR 3963.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosed
new
Ref.
evidence
MUR 3963.

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COMMISSION
OFFICE OF GENERAL
COUNSEL
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24043591433

IN THE CIRCUIT COURT FOR
ANNE ARUNDEL COUNTY, MARYLAND

LAWRENCE A. WAY,
Plaintiff,

VS.

JOAN VINSON STALLINGS;
et. al.,
Defendants.

*
*
*
* CASE NO. 92-073660L
*
*
*

ORAL DEPOSITION OF
MARK BLAHNIK

ANSWERS AND DEPOSITION OF MARK

BLAHNIK, a witness produced on behalf of the
Plaintiff taken in the above styled and numbered
cause on the 2nd day of November, 1993, before
Holly D. Capra, a Certified Shorthand Reporter
in and for the State of Texas, at the offices of
Hughes & Luce, 1717 Main Street, Suite 2800, in
the City of Dallas, County of Dallas and State
of Texas, in accordance with the Stipulation
hereinafter set forth.

COPY

24043591434

A P P E A R A N C E S

HON. JON A. HOPPE
Attorney and Counselor at Law
4800 Hampden Lane, Suite 360
Bethesda, Maryland 20814
APPEARING FOR THE PLAINTIFF

HON. KIM ASKEW
Hughes & Luce
1717 Main Street, Suite 2800
Dallas, Texas 75201
APPEARING FOR DEFENDANTS JOAN VINSON
STALLINGS, MARYLAND DRAFT PEROT COMMITTEE,
PEROT PETITION COMMITTEE, H. ROSS PEROT,
and MARK BLAHNIK

ALSO PRESENT:

Lawrence A. Way

24043591435

1 Systems Corporation?

2 A. Perot Systems I was a corporate
3 recruiter again.

4 Q. What are your current duties with The
5 Perot Group?

6 A. The operations manager duties. You
7 want me to --

8 Q. That's correct.

9 A. -- go through them?

10 MS. ASKEW: I think you've
11 answered that.

12 Q. Yes, I think you have. Did you ever
13 hold a position with The Perot Petition
14 Committee?

15 A. Yes.

16 Q. What position did you hold with The
17 Perot Petition Committee?

18 A. I was in charge of the field staff.

19 Q. And what were your duties as in charge
20 of the field staff?

21 A. I had a group of approximately fifteen
22 people who assisted the various state
23 organizations in their efforts to get Ross Perot
24 on their respective states' ballots.

25 Q. In this capacity did you ever have any

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24043591437

1 those had three to five field representatives
2 that worked for them who actually traveled
3 three, four states, something of that nature and
4 just assisted the state organizations however
5 they could.

6 Q. At the time you were working with The
7 Perot Petition Committee were you also an
8 employee of The Perot Group?

9 A. Yes.

10 Q. Were you being compensated by The Perot
11 Group at the time you were working for The Perot
12 Petition Committee?

13 A. Yes.

14 Q. Were you being compensated by The Perot
15 Petition Committee for the work you conducted
16 for them?

17 A. No.

18 Q. Were you working full-time for The
19 Perot Petition Committee or part-time?

20 MS. ASKEW: During what time
21 period?

22 Q. During the time period -- actually, I
23 should say -- basically, the entire time period
24 that you worked for The Perot Petition
25 Committee.

1 A. I maintained all of my regular duties
2 with The Perot Group as well as working with The
3 Petition Committee.

4 Q. Can you tell me or can you approximate
5 how you divided your time?

6 A. Probably 50/50. Daytimes I did the
7 petition work mainly and nighttimes I did my
8 job; caught up on that.

9 Q. How frequent did you have contact with
10 your immediate supervisor at the PPC, H. Ross
11 Perot?

12 A. Probably one phone call a day.

13 Q. What did you tend to discuss in these
14 phone calls?

15 MS. ASKEW: I will object to
16 that to the extent it relates to other
17 volunteers or matters outside the scope of the
18 October order, October 12th order.

19 MR. HOPPE: As amended, yes.

20 MS. ASKEW: Well, why don't
21 you ask the question reflecting that so that
22 it's clear to the witness what the question is.

23 Q. Did any of these phone calls include
24 discussions of Mr. Way or the situation in
25 Maryland?

24043591438



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SEPTEMBER 9, 1994

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
SEP 12 12 32 PM '94

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: MUR 3963

Dear Mr. Dyck:

This letter is in response to your August 27, 1994, letter. In your letter, you refer to allegations that the Perot Petition Committee used corporate employees paid by the Perot Group to run the campaign. Such allegations were not clearly evident in your previous letters of June 7, 1994 and August 19, 1994.

These allegations relate to the earlier complaint which you filed with the Federal Election Commission on May 11, 1994 and which we have numbered MUR 3963. Therefore, your previous correspondence will be added to the file in MUR 3963.

You will be notified as soon as the Commission takes final action in MUR 3963.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

More information on "paid" Perot volunteers.

24043591439

contingent arrived, but the meeting with Yane, Arnebeck, Melbye and Monroe went forward.⁵

Instantly upon meeting the two sober young men named "Russ," Yane felt some discomfort at their acceptance of him. Roger Allen Yane is best described as an "acquired taste." He can and does break suddenly into uproarious laughter which, when he is wearing Texas boots and a fancy buckle, and his audience is wearing pin-stripes, is not viewed as the best board room taste. His most famous joke about life and times in the business world is his game of sending a single FAX to someone else with the message "URGENT, IGNORE FIRST FAX." After a discussion with John Moore, he once faxed copies of \$300 in assorted bills to "Dallas" saying that this was the way to keep track of the money. He then asked Moore for a receipt!⁶ He speaks plainly, almost insultingly, when he is trying to make a point but he listens intently to the other side. With women, Yane is polite to a fault. His manner is respectful, patient and charming--a kind of memorable chivalry in the nineties which redeems his gruff approach to business. At this first meeting with Russ and Russ and after some pleasantries, Yane asked for their business cards. They didn't carry any. Yane asked for some identification. They didn't have any.

The U.S. Marine overtook Roger Allen Yane. "You guys come prancing into Ohio saying that you are direct representatives of the next President of the United States. Our only conversations have been on the phone, sometimes to funny telephone numbers. I don't know you, you want to tell me what to do, and you don't have a business card or an ID? What kind of a joke is this..." and Yane picked up the phone and telephoned the Perot Petition Committee in Dallas. "Describe these guys," he said. The description fit, Russ and Russ were Real, but the garrulous Yane had not scored any points with either one of them, nor would he ever. Had they already made a deal with Sanders, or had they arrived with orders to make changes? Were the vicious Yane rumors which surfaced in northern Ohio a few weeks later at the beginning of May already circulating among Monroe, Melbye and Sanders in

⁵ Sanders, Russ Melbye later explained to Yane and his party at dinner on May 6th, had attempted to celebrate the arrival of the Dallas reps with a balloon and cheering crowd. This repulsed Melbye, he said (but his description of it as foolish was a compliment in disguise--he had been told to look for just such a person as long as he could lie low himself). Besides, he was a natural party pooper. He strictly refused to make any public appearances. He agreed to attend a Dayton rally once but refused to speak and shied away from the speaker's platform entirely. Lying low was standard procedure---an attempt to manipulate and take control without the public at large knowing people from Dallas even existed. How could a "grassroots" movement be believed if there were salaried Perot people giving orders. Melbye even denied being paid by Perot, a fact the FEC filings promptly gave the lie to.

⁶ When later they needed to keep their spirits up, Sweet and Yane would joke that this was probably the downward turning point in the relationship between an exuberant and fun-loving Roger Yane, and a white-shirted humorless crowd in Dallas.

24043591440

The New York Times

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NEW YORK, THURSDAY, OCTOBER 1, 1992

Perot Hired Private Investigators To Check Campaign Volunteers

By STEVEN A. HOLMES
Special to The New York Times

DALLAS, Sept. 30 — Ross Perot, whose original candidacy for the Presidency was dinged by accusations that he had hired private detectives to investigate business competitors, hired California investigators to look into some of the volunteers in his campaign.

An official with the Perot campaign acknowledged today that Mr. Perot paid more than \$20,000 in August and September to the Callahan & Gibbons Group, a San Francisco company that does private investigations.

Clayton Mulford, general counsel for the Perot campaign, said that most of the money was paid to the private security centers to provide guards at a number of state offices of the Perot campaign. But Mr. Mulford said some of the money was used to investigate allegations that campaign workers had misappropriated funds or had criminal records.

Not a Matter of Honor

"There were constant complaints from volunteers about this person doing this, this person doing that, this person making money," Mr. Mulford said. "We didn't know what to believe. Our people, in certain isolated instances, would have Callahan & Gibbons run checks."

"This was not done in a matter of honor or volunteers," Mr. Mulford added. "It was done as a result of requests by volunteers or accusations by volunteers that were forwarded to

Dallas about misappropriation of funds or criminal records."

The use of private investigators to run checks on business and political rivals was raised several times during Mr. Perot's original campaign last June. For example, a report in The Washington Post, dated by Mr. Perot, said he had once hired detectives to check into a land transaction conducted by President Bush's partner in the oil business.

Other reports said Mr. Perot had hired private investigators to spy on his own children and their friends, a charge that he also denied.

On June 24, at a news conference in Annapolis, Md., Mr. Perot said he had employed private investigators only on rare occasions when there was a

Continued on Page A19, Column 1

① MR. Blahnik was not a "former employee of the Rust Group" — He was an employee. See Blahnik's affidavit I sent you.

② On pg. 231 of Schedule R of Perot Petition Committee (PPC) Itemized Disbursements — they (PPC) called purpose of disbursement to Callahan & Gibbons "legal fees" for investigating volunteers. As you know they changed this to "security fees" when they were later investigated.

Ross Perot

Private Investigators Were Hired to Check Up on Perot Volunteers

Continued From Page A1

ensure that an employee of his computer-service company might be seeking money. He said the charges against him were the result of a smear campaign conducted by the Republican Party.

"My total experience of investigating people is like a grain of sand on a large beach compared to the growing investigations, day after day after day after day by the Republican dirty tricks," Mr. Perot said at the time.

Report of Bush Threats

Mr. Mulford said the use of private investigators to check on campaign volunteers was authorized by Mark Blahnik, who was head of field operations for the Perot campaign. Mr. Blahnik, a former employee of the Perot Group, a Perot company, was credited by some volunteers as trying to impose the will of the Dallas headquarters on state operations. Attempts to reach Mr. Blahnik for comments by telephone at the headquarters and his home were unsuccessful.

"There was one of intimidation and threats," said John O'Hara, a former Perot volunteer in Austin, who said he had several run-ins with the field operations unit in the Dallas office. "I received death threats. I sleep with my gun next to my bed for about two months. I got involved in March because I wanted to help my country. If this is what politics is about, you can count me out."

There is no evidence that the Callahan & Gibbons Group or any other part of the Perot campaign was involved in any threats against campaign workers. Though the Callahan & Gibbons Group is not a law firm, Mr. Perot's August filing with the Federal Election Commission lists more than \$26,000 in payments to the company as "legal fees."

Mr. Mulford said today that that was



Ross Perot's campaign operations have been severely reduced from what they once were, including having only 12 telephone lines coming into the telephone bank where there were once 400. A volunteer answered phones in the headquarters in Dallas.

the result of a clerical error and an assumed disclosure form would be filed with the commission.

In recent days, several former campaign volunteers have complained of being the target of investigations. Tom O'Hara, a former state leader of the Perot Petition Committee in New Jer-

sey, said he was moved out of his post after being accused of improper post behavior, which he declined to specify but said was untrue. In a telephone interview Mr. O'Hara said he had demanded to know the source of the information, but "ran into a stone wall in Dallas."

Lawrence Way, the former Perot coordinator in Frederick County, Md., said he was removed from his job after a run-in with Joan Vroman, the state chairwoman. After his dismissal, Mr. Way said circumstances were created by Perot officials in Maryland that he was once an official with the Illinois Klan, a charge he denies. Mr. Way said that at one point he was visited by two people he said identified themselves as "Perot security people."

Shander Still Pending

Mr. Way said he was later told by a person he would not identify that the two were employees of the Callahan & Gibbons Group and had been dispatched from New York. Mr. Way currently has a \$50 million slush fund filed against Mr. Perot.

Mr. Mulford said today that two security guards were hired from Callahan & Gibbons to guard workers in the Maryland office after they reported receiving threats from Mr. Way and after he was reported to have used a racial slur when addressing a black Perot official.

Mr. Mulford said the hiring of the security guards was authorized by Thomas Barr, a New York lawyer who was a legal adviser to the Perot campaign. Mr. Barr could not be reached for comment.

Mr. Mulford said Callahan & Gibbons was also called on to investigate a report that an Illinois resident who was chosen to cast a vote for Mr. Perot in the Electoral College had a criminal record. He said the concern was that as a convicted felon, the observer might not be eligible to vote. Mr. Mulford said the matter "turned out not to be a legal issue," because Illinois law allowed convicted felons who were not in prison to vote.

The Callahan & Gibbons Group received its license as a private-investigation business in California last April. John Gibbons, a principal owner, spent 17 years as a prosecutor with the United States Attorney's office and is an expert in industrial counterespionage.

SCHEDULE B
Operating Expenditures

ITEMIZED DISBURSEMENTS

PAGE 04 OF 231
FOR FORM NUMBER 23

NAME OF COMMITTEE (in Full)
Perot Petition Committee C00263145

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

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Glenda Potts Thacker 3135 Settles Rd. Owensboro, KY 42303	rent Disbursement for [X]General	08/27/92	\$1800.00
The Callahan & Gibbons Group 333 California Street Ste 800 San Francisco, CA 98104-2012	Legal Fees Disbursement for [X]General	08/14/92	\$3505.00
The Callahan & Gibbons Group 333 California Street Ste 800 San Francisco, CA 98104-2012	Legal Fees Disbursement for [X]General	08/14/92	\$18000.00
The Callahan & Gibbons Group 333 California Street Ste 800 San Francisco, CA 98104-2012	Legal Fees Disbursement for [X]General	08/21/92	\$5930.86
The Callahan & Gibbons Group 333 California Street Ste 800 San Francisco, CA 98104-2012	Legal Fees Disbursement for [X]General	08/21/92	\$3127.15
The Callahan & Gibbons Group 333 California Street Ste 800 San Francisco, CA 98104-2012	Legal Fees Disbursement for [X]General	08/28/92	\$6497.65
The Callahan & Gibbons Group 333 California Street Ste 800 San Francisco, CA 98104-2012	Legal Fees Disbursement for [X]General	08/28/92	\$19166.25
The Courts at Preston Oaks 5400 Preston Oaks Rd Dallas, TX 75240	Rent Disbursement for [X]General	08/27/92	\$1295.00
THE OFFICE HOUSE 640 W. MAXWELL ST. LEXINGTON, KY 40500	FURNITURE RENTAL Disbursement for [X]General	08/28/92	\$292.00
SUBTOTAL of Disbursements This Page.....>			\$59613.91
TOTAL This Period.....>			

PR changed to "security fees" once it was disclosed that Callahan & Gibbons are not lawyers. They were investigators investigating Perot volunteers.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE

SEP 26 9 33 AM '94

SEPTEMBER 9, 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: MUR 3963

Dear Mr. Dyck:

This letter is in response to your August 27, 1994, letter. In your letter, you refer to allegations that the Perot Petition Committee used corporate employees paid by the Perot Group to run the campaign. Such allegations were not clearly evident in your previous letters of June 7, 1994 and August 19, 1994.

These allegations relate to the earlier complaint which you filed with the Federal Election Commission on May 11, 1994 and which we have numbered MUR 3963. Therefore, your previous correspondence will be added to the file in MUR 3963.

You will be notified as soon as the Commission takes final action in MUR 3963.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

more
info.

Edward Dyck

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
SEP 26 10 09 AM '94

24043591443

24043591444

TO: Perot Case File
FROM: Peter Butcher
SUBJECT: Notes of 4/28/94 Telephone Conversation with Robert Penn, (214) 520-7794
DATE: April 28, 1994

Penn started volunteering around the second week of the petition drive, answering phones on the phone bank. He said a real cross section of people came in to volunteer, some of them "homeless" who volunteered to get a free meal. Penn said he always came in with a suit and tie on, because he would show up in the afternoon after leaving work. He said he got a little more respect because of the way he looked and got more responsibility because of it.

The phone banks he worked on were located at Perot Headquarters on Merit Drive. He would volunteer from about 3:30 in the afternoon until about 7:00, 8:00 or 9:00 at night. He would answer phones, and he would carry information from the phone bank, which was on the second floor, to the computer room, which was on the eleventh floor. Ross Perot's own office was on the seventeenth floor. Since Penn was in the construction business he knew people in real estate, and because of his connections he said he was able to help some of the people get information they needed. In turn, Penn got to know "people on the top floor" and they liked him. Penn said that eventually he was allowed to go anywhere, and also became friendly with Mark Blahnik, who he said was Perot's right hand man.

Penn said a woman named "Muffie" worked in the building, and her secretary was in charge of reading computer printouts and sending them to state coordinators. Penn started helping her out in the computer room in the evenings.

Penn said that the computer room was full of old, much used computers that everyone worked on. But he noticed that around 7:00 in the evening two men would arrive, "move everyone out," and work in the back on new, shiny computers. One guy was short, with glasses, the other was tall. He later found out that the tall guy was Perot's comptroller, the "number two guy in Perot Systems." Penn said he started talking to the two guys and got to be friendly with them.

Penn would "hang around" when they worked on their computers, and they started showing him what they were doing. At first, they were typing a lot of codes and numbers into the computers, but they weren't able to get access to the databases they wanted. Then they brought in a grey box, about the size of a telephone answering machine, and hooked it up to the computers. The box would "spin numbers" onto the screen in rapid succession, and the screen kept "reformatting," by working with a particular set of numbers, and then move on to another set, and so on.

The guys told him that they were trying to get social security numbers and drivers license numbers of people in Nevada and Texas from voter registration list databases. Apparently some information from voter registration lists is available to the public, but not this information. Eventually, the two men succeeded, and Penn saw them access the voter registration lists,

with the social security numbers, and print them out.

Penn saw this on three or four nights over a two week period. He said the two men were acting and talking secretly, and he said he got uneasy about what was going on. He said that soon after this the people started "splitting up" and he quit volunteering. He could not remember particular dates of these events, but said it would be sometime in April or May, before the headquarters were moved down the street.

Penn said that around this time a whole group of young guys in their twenties arrived and took over the volunteer jobs. They were called volunteers, but they were all getting paid about \$35,000 a year, and were bragging about it. Penn said they were arrogant, rude, and obnoxious, and treated the older volunteers badly, and the older volunteers all left. He said the young guys handled field operations, and were dispatched to handle what was going on in the individual states. He said they would come in to the office and talk about how they were having trouble with people in a particular state, and would play around on the computers, saying they needed to find information on the people they were having trouble with, so they could use the information to get rid of them. Penn could not remember their names. He did not remember the name Russ Melbye, and although he had heard the name Russ Monroe, he didn't know if that was one of the people or not.

John Paxton, a reporter for CBS eventually got word of what Penn had seen, and interviewed Penn. Paxton and Penn figured out that the short guy with glasses had been paid several hundred thousand dollars by Perot, and the receipts for the payments read "furniture rental."

The FBI and the secret service got word of Penn's story as well, and also interviewed him, eventually having him take a couple of lie detector tests. Penn could not remember the names of the two computer hackers, but was able to pick their pictures out of a group of photographs.

After Penn talked with the FBI he got a phone call from Clay Mulford, who told Penn he was liable for slander and that Mulford would file a suit against him if he didn't stop slandering the two individuals, whom Mulford named in the conversation. Penn responded by saying that all he had done was pick their pictures out and describe what he had seen, and that he never knew their names until Mulford told him what they were during the conversation. Mulford said "Oh" and hung up. The only other response of the Perot people that Penn could remember was that Sharon Holman said to the press "Do you think we'd be foolish enough to let Penn in the room if we were doing those things?"

34043591445

BEFORE THE FEDERAL ELECTION COMMISSION

SEP 22 9 43 AM '94

In the Matter of

)
) Enforcement Priority
)

GENERAL COUNSEL'S MONTHLY REPORT

I. INTRODUCTION

This report is the first Enforcement Priority System Monthly Report.¹ The purpose of this August Monthly Report is to recommend that the Commission no longer pursue the identified lower priority and stale cases.

II. CASES RECOMMENDED FOR CLOSING

A. Cases Not Warranting Further Pursuit Relative to Other Cases Pending Before the Commission

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission approved criteria

By closing such cases the Commission is

1. Prior to this report, Enforcement Priority System reports were done on a quarterly basis. However, on July 19, 1994, the Commission decided to change the reporting frequency from quarterly to monthly. Because this Office needed sufficient time to implement the change in reporting frequency, the August Monthly Report includes cases for July and August. In the future, the Monthly Report will reflect one month's activity.

Additionally, this Office previously indicated to the Commission that at the end of each quarter, we will provide a statistical recap for the activity that occurred during the quarter. Sometime in early October, this Office will provide a report for third quarter activity.

24043591446

able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 16 cases which do not warrant further pursuit relative to the other pending cases.² A short description of each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-16. For the Commission's convenience, the narratives for externally-generated matters are immediately followed by the complaint and response(s) and the narratives for internally-generated matters are immediately followed by the referral or sua sponte submission.

B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 5 cases that

do not

2. These matters are: MUR 3963; MUR 3981; MUR 3982; MUR 3983; MUR 3989; MUR 3992; MUR 3993; MUR 3994; MUR 4006; MUR 4011; MUR 4015; MUR 4017; MUR 4020; MUR 4021; and PM 300.

24043591447

warrant further investment of significant Commission resources.³ Since the recommendation not to pursue the identified cases is based on staleness, this Office has not prepared separate narratives for these cases. However, for the externally-generated matters, the complaint and response(s) are attached to the report and for internally-generated matters, the referral is attached. See Attachments 17-21.

24043591448

3. These matters are: MUR 3784; MUR 3788; RAD 93L-52, RAD 93NF-23, and PM 287.

IV. RECOMMENDATIONS

A. Decline to open a MUR, close the file, and approve the appropriate letter in the following matters:

- 1) RAD 93L-52
- 2) RAD 93NF-23
- 4) PM 287
- 5) PM 300

B. Take no action, close the file, and approve the appropriate letter in the following matters:

- 1) MUR 3784
- 2) MUR 3788
- 3) MUR 3963
- 4) MUR 3981
- 5) MUR 3982
- 6) MUR 3983
- 7) MUR 3989
- 8) MUR 3992
- 9) MUR 3993
- 10) MUR 3994
- 11) MUR 4006
- 12) MUR 4011
- 13) MUR 4015
- 14) MUR 4017
- 15) MUR 4020
- 16) MUR 4021

Date

9-21-94

Lawrence M. Noble
Lawrence M. Noble
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	Agenda Document
Enforcement Priority	)	#X94-94

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on September 27, 1994, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

A. Decline to open a MUR, close the file, and approve the appropriate letter in the following matters:

- 1) RAD 93L-52;
- 2) RAD 93NF-23;
- 3) PM 287;
- 4) PM 300.

B. Take no action, close the file, and approve the appropriate letter in the following matters:

- 1) MUR 3784;
- 2) MUR 3788;
- 3) MUR 3963;
- 4) MUR 3981;
- 5) MUR 3982;
- 6) MUR 3983;
- 7) MUR 3989;

(continued)

34043591450

Federal Election Commission
Certification: Enforcement Priority
September 27, 1994

Page 2

- 8) MUR 3992;
- 9) MUR 3993;
- 10) MUR 3994;
- 11) MUR 4006;
- 12) MUR 4011;
- 13) MUR 4015;
- 14) MUR 4017;
- 15) MUR 4020;
- 16) MUR 4021.

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

Attest:

9-29-94
Date

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

24043591451



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SEP 29 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: MUR 3963

Dear Mr. Dyck:

On May 11, 1994, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Attachment
Narrative

Date the Commission voted to close the file: SEP 27 1994

24043591452

NUR 3963

PEROT PETITION COMMITTEE

The complainant, Edward Dyck, alleges that the Perot Petition Committee aka Perot '92 accepted in-kind corporate contributions from Perot Systems and the Perot Group in the form of employees loaned to the campaign.

In their responses to the complaint, Perot '92, Perot Systems Corporation, and the Hillwood Development Corporation state that five of the eight employees mentioned in the complaint were exclusively employed by Perot '92 or a temporary help agency that was paid as a vendor to the campaign. The respondents state that the remaining three employees were employees of the Perot Group, an unincorporated sole proprietorship, owned and funded by Ross Perot for the purpose of managing Mr. Perot's personal affairs. The respondents indicate that these employees were therefore paid from Mr. Perot's personal funds and that the expenses were properly reported.

This matter involves less significant issues relative to the other issues pending before the Commission.

34043591453



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEP 29 1994

Kenneth A. Gross, Esq.
Skadden, Arps, Slate,
Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111

RE: MUR 3963
Perot Systems Corporation

Dear Mr. Gross:

On May 23, 1994, the Federal Election Commission notified your clients of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Perot Systems. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Attachment
Narrative

Date the Commission voted to close the file:

SEP 27 1994

24043591454

MUR 3963

PEROT PETITION COMMITTEE

The complainant, Edward Dyck, alleges that the Perot Petition Committee aka Perot '92 accepted in-kind corporate contributions from Perot Systems and the Perot Group in the form of employees loaned to the campaign.

In their responses to the complaint, Perot '92, Perot Systems Corporation, and the Hillwood Development Corporation state that five of the eight employees mentioned in the complaint were exclusively employed by Perot '92 or a temporary help agency that was paid as a vendor to the campaign. The respondents state that the remaining three employees were employees of the Perot Group, an unincorporated sole proprietorship, owned and funded by Ross Perot for the purpose of managing Mr. Perot's personal affairs. The respondents indicate that these employees were therefore paid from Mr. Perot's personal funds and that the expenses were properly reported.

This matter involves less significant issues relative to the other issues pending before the Commission.

24043591455



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SEP 29 1994

Mark Kinney, Registered Agent
Hillwood Development Corporation
D/B/A The Perot Group
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

RE: MUR 3963

Dear Mr. Kinney:

On May 23, 1994, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against The Perot Group. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Attachment
Narrative

Date the Commission voted to close the file: SEP 27 1994

24043591456

MUR 3963

PEROT PETITION COMMITTEE

The complainant, Edward Dyck, alleges that the Perot Petition Committee aka Perot '92 accepted in-kind corporate contributions from Perot Systems and the Perot Group in the form of employees loaned to the campaign.

In their responses to the complaint, Perot '92, Perot Systems Corporation, and the Hillwood Development Corporation state that five of the eight employees mentioned in the complaint were exclusively employed by Perot '92 or a temporary help agency that was paid as a vendor to the campaign. The respondents state that the remaining three employees were employees of the Perot Group, an unincorporated sole proprietorship, owned and funded by Ross Perot for the purpose of managing Mr. Perot's personal affairs. The respondents indicate that these employees were therefore paid from Mr. Perot's personal funds and that the expenses were properly reported.

This matter involves less significant issues relative to the other issues pending before the Commission.

24043591457



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEP 29 1994

Mike Poss, Treasurer
Perot '92
12377 Merit Drive, Suite 1700
Dallas, TX 75251

RE: MUR 3963

Dear Mr. Poss:

On May 23, 1994, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Perot '92 and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Attachment
Narrative

Date the Commission voted to close the file:

SEP 27 1994

24043591458

HUR 3963
PEROT PETITION COMMITTEE

The complainant, Edward Dyck, alleges that the Perot Petition Committee aka Perot '92 accepted in-kind corporate contributions from Perot Systems and the Perot Group in the form of employees loaned to the campaign.

In their responses to the complaint, Perot '92, Perot Systems Corporation, and the Hillwood Development Corporation state that five of the eight employees mentioned in the complaint were exclusively employed by Perot '92 or a temporary help agency that was paid as a vendor to the campaign. The respondents state that the remaining three employees were employees of the Perot Group, an unincorporated sole proprietorship, owned and funded by Ross Perot for the purpose of managing Mr. Perot's personal affairs. The respondents indicate that these employees were therefore paid from Mr. Perot's personal funds and that the expenses were properly reported.

This matter involves less significant issues relative to the other issues pending before the Commission.

24043591459

McEnery

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

October 12, 1994

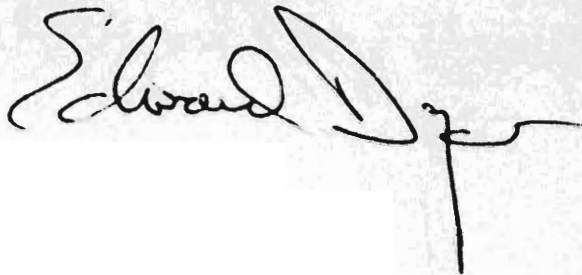
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
OCT 20 11 06 AM '94

Mary Taksar
Attorney
Control Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Dear Mary:

Reference your letter to me dated Sept. 29, 1994, enclosed, The Perot Group is not a sole proprietorship as you state. Reference the Texas Secretary of State (512)463-5555, The Perot Group is an "assumed name" for the Hillwood Development Corporation. It is incorporated so therefore it is an "in-kind corporate contribution." The FEC holds the Republicans accountable for such actions. Are you going to hold Mr. Perot accountable?

Sincerely,



24043591460

ST. LOUIS POST-DISPATCH

NEWS ANALYSIS

THURSDAY, OCTOBER 13, 1994

Trade Groups Sue FEC Over Endorsements

By The Associated Press

WASHINGTON—

Leadng trade groups for business and doctors sued the Federal Election Commission Wednesday.

They contend that new rules issued by the FEC prevent them from recommending to their members how to vote in congressional elections next month.

"This is truly an outrageous rule that strikes at the heart of our First Amendment rights," said Stephen Bokor, general counsel for the U.S. Chamber of Commerce. It is challenging the rule in federal court along with the American Medical Association.

Federal election law bars corporations from making contributions to, or on behalf of, candidates for Congress.

But trade groups that are set up as corporations, such as the chamber and the AMA, are allowed to communicate political messages to their members.

Last November, the FEC issued a rule defining who can be considered members of such groups. Among other qualifications, the agency said, members should have the power to vote for at least one member of the group's highest governing body.

That ruling excludes virtually all of the chamber's 220,000 members, because its board of directors is elected by the board itself. About 44,000 AMA members would be excluded, because they are not members of state medical societies and thus cannot vote for the association's House of Delegates.

24043591461



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3963

DATE FILMED 10-25-94 CAMERA NO. 4

CAMERAMAN JM H

24043591462



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Date: 10/20/94

☒ Microfilm
☐ Public Records
☐ Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED MUR 3963

24043591591

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

October 12, 1994

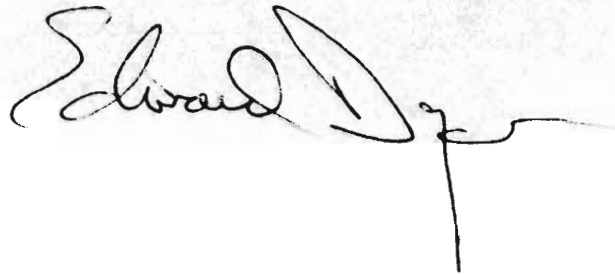
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
OCT 20 11 06 AM '94

Mary Taksar
Attorney
Control Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Dear Mary:

Reference your letter to me dated Sept. 29, 1994, enclosed, The Perot Group is not a sole proprietorship as you state. Reference the Texas Secretary of State (512)463-5555, The Perot Group is an "assumed name" for the Hillwood Development Corporation. It is incorporated so therefore it is an "in-kind corporate contribution." The FEC holds the Republicans accountable for such actions. Are you going to hold Mr. Perot accountable?

Sincerely,



24043591592



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEP 29 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: MUR 3963

Dear Mr. Dyck:

On May 11, 1994, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Attachment
Narrative

Date the Commission voted to close the file: SEP 27 1994

24043591593

MUR 3963

PEROT PETITION COMMITTEE

The complainant, Edward Dyck, alleges that the Perot Petition Committee aka Perot '92 accepted in-kind corporate contributions from Perot Systems and the Perot Group in the form of employees loaned to the campaign.

In their responses to the complaint, Perot '92, Perot Systems Corporation, and the Hillwood Development Corporation state that five of the eight employees mentioned in the complaint were exclusively employed by Perot '92 or a temporary help agency that was paid as a vendor to the campaign. The respondents state that the remaining three employees were employees of the Perot Group, an unincorporated sole proprietorship, owned and funded by Ross Perot for the purpose of managing Mr. Perot's personal affairs. The respondents indicate that these employees were therefore paid from Mr. Perot's personal funds and that the expenses were properly reported.

This matter involves less significant issues relative to the other issues pending before the Commission.

24043591524

NEWS ANALYSIS

THURSDAY, OCTOBER 13, 1994

Trade Groups Sue FEC Over Endorsements

By The Associated Press

WASHINGTON—

Leadng trade groups for business and doctors sued the Federal Election Commission Wednesday.

They contend that new rules issued by the FEC prevent them from recommending to their members how to vote in congressional elections next month.

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But trade groups that are set up as corporations, such as the chamber and the AMA, are allowed to communicate political messages to their members.

Last November, the FEC issued a rule defining who can be considered members of such groups. Among other qualifications, the agency said, members should have the power to vote for at least one member of the group's highest governing body.

That ruling excludes virtually all of the chamber's 220,000 members, because its board of directors is elected by the board itself. About 44,000 AMA members would be excluded, because they are not members of state medical societies and thus cannot vote for the association's House of Delegates.

24043591595



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date: 11/10/94

☒ Microfilm
☐ Public Records
☐ Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED HUR 3963

94043591955

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

November 6, 1994

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
Nov 8 11 55 AM '94

Trevor Potter
Chairman
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

MUR 3963

Dear Sir:

Reference the enclosed letter from Mary Taskar of the FEC.

Is Ms. Taskar saying that the "in kind contributions" that were made to Ross Perot in 1992 are condoned by the FEC?

The investigation performed by Ms. Taskar was shoddy.

If "in kind contributions" were all right for Perot, then the rules should be changed to include Republicans and Democrats.

Why won't Ms. Taskar send me a copy of the file? I will pay the expense.

Sincerely,

Edward Dyck

94043591956



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

SEP 29 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: MUR 3963

Dear Mr. Dyck:

On May 11, 1994, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Attachment
Narrative

Date the Commission voted to close the file: SEP 27 1994

94043591957

NUR 3963

PEROT PETITION COMMITTEE

The complainant, Edward Dyck, alleges that the Perot Petition Committee aka Perot '92 accepted in-kind corporate contributions from Perot Systems and the Perot Group in the form of employees loaned to the campaign.

In their responses to the complaint, Perot '92, Perot Systems Corporation, and the Hillwood Development Corporation state that five of the eight employees mentioned in the complaint were exclusively employed by Perot '92 or a temporary help agency that was paid as a vendor to the campaign. The respondents state that the remaining three employees were employees of the Perot Group, an unincorporated sole proprietorship, owned and funded by Ross Perot for the purpose of managing Mr. Perot's personal affairs. The respondents indicate that these employees were therefore paid from Mr. Perot's personal funds and that the expenses were properly reported.

This matter involves less significant issues relative to the other issues pending before the Commission.

24043591958



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 12, 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: 3963

Dear Mr. Dyck:

This letter is in regard to your letter dated October 7, 1994, which I received on October 11, 1994. Your letter requests a copy of the file in MUR 3963. I have forwarded your request to the Public Disclosure Division, the appropriate division to handle a request for a copy of the file once it has been placed on the public record. Please contact the Public Disclosure Division at 1-800-424-9530 regarding your request.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

94043591959

NEWS ANALYSIS

THURSDAY, OCTOBER 13, 1994

Trade Groups Sue FEC Over Endorsements

By The Associated Press

WASHINGTON—

Leadung trade groups for business and doctors sued the Federal Election Commission Wednesday.

They contend that new rules issued by the FEC prevent them from recommending to their members how to vote in congressional elections next month.

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That ruling excludes virtually all of the chamber's 220,000 members, because its board of directors is elected by the board itself. About 44,000 AMA members would be excluded, because they are not members of state medical societies and thus cannot vote for the association's House of Delegates.

94043591960

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

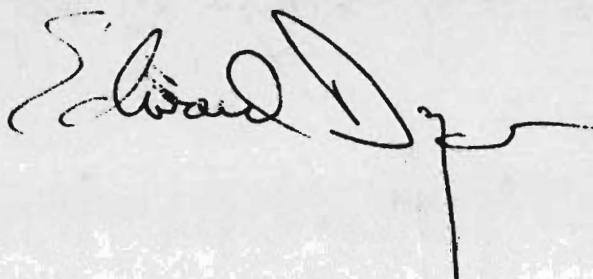
October 12, 1994

Mary Taksar
Attorney
Control Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Dear Mary:

Reference your letter to me dated Sept. 29, 1994, enclosed, The Perot Group is not a sole proprietorship as you state. Reference the Texas Secretary of State (512)463-5555, The Perot Group is an "assumed name" for the Hillwood Development Corporation. It is incorporated so therefore it is an "in-kind corporate contribution." The FEC holds the Republicans accountable for such actions. Are you going to hold Mr. Perot accountable?

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward Dyck", with a long horizontal flourish extending to the right.

24043591961

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

August 27, 1994

Lois Lerner
Associate General Counsel
Federal Election Commission
Washington D.C. 20463

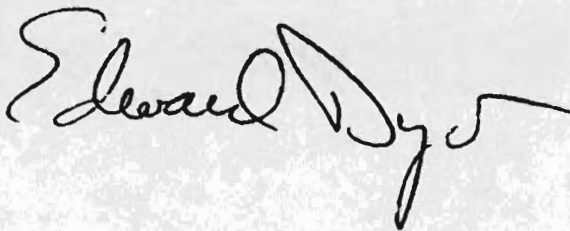
Dear Sir:

Thank you for your reply dated August 24, 1994 (enclosed).
In your reply you answered two of my three charges.

Your answer to my charges that The Perot Petition
Committee investigated volunteers and invaded their privacy
"does not appear to constitute a violation under your
jurisdiction." My answer to you is that this country will
have serious problems in the next Presidential Election
now that "investigating" anybody and everybody is fair.

But what about my third charge? That the Perot Petition
Committee was using corporate employees (paid for by The Perot
Group) to run it's campaign? I know for a fact from reading
FEC literature that this is illegal for the Republicans and
Democrats? Is Perot exempt?

Sincerely,



24043591962



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO
THE PUBLIC FILE OF CLOSED MUR 3963.

96043720730

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

January 2, 1996

JAN 16 9 51 AM '96

JAN 11 3 07 PM '96

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017
314-878-0422

Mary Taksar
Attorney
Control Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

RE: MUR 3963

Dear Mary:

Reference my complaint against Ross Perot and The Perot Petition Committee involving illegal contributions which the Commission closed on September 27, 1994. I have just uncovered some unbelievable evidence that Clay Mulford, Russ Monroe, Mike Poss, and Mark Blahnik all lied in their sworn affidavits to you. They SWORE that were employed by The Perot Group and were PAID by The Perot Group from March of 1992 through November 1992.

Reference the enclosed certificate from the County of Dallas, Texas, the name "The Perot Group" was abandoned on May 13, 1992!

I am asking The Federal Election Commission to thoroughly investigate this gross breach of veracity to the United States Government by the above named individuals and send me a copy of the findings, of which I will compensate your agency.

Yours very sincerely,


Edward Dyck

9504372071



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

SEP 29 1994

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

RE: MUR 3963

Dear Mr. Dyck:

On May 11, 1994, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Attachment
Narrative

Date the Commission voted to close the file: SEP 27 1994

96043720732

MUR 3963

PEROT PETITION COMMITTEE

The complainant, Edward Dyck, alleges that the Perot Petition Committee aka Perot '92 accepted in-kind corporate contributions from Perot Systems and the Perot Group in the form of employees loaned to the campaign.

In their responses to the complaint, Perot '92, Perot Systems Corporation, and the Hillwood Development Corporation state that five of the eight employees mentioned in the complaint were exclusively employed by Perot '92 or a temporary help agency that was paid as a vendor to the campaign. The respondents state that the remaining three employees were employees of the Perot Group, an unincorporated sole proprietorship, owned and funded by Ross Perot for the purpose of managing Mr. Perot's personal affairs. The respondents indicate that these employees were therefore paid from Mr. Perot's personal funds and that the expenses were properly reported.

This matter involves less significant issues relative to the other issues pending before the Commission.

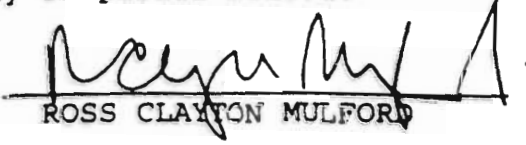
9604372073

AFFIDAVIT OF ROSS CLAYTON MULFORD

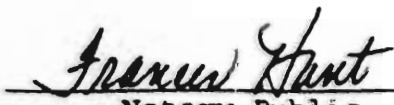
Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

I, ROSS CLAYTON MULFORD, being duly sworn, depose and say:

1. During the period between March, 1992 and November, 1992, I was General Counsel for Perot '92.
2. The Perot Group is an unincorporated sole proprietorship owned by Ross Perot created to manage Ross Perot's personal affairs. Mike Poss, J. Russ Monroe, and Mark Blahnik were employed by the Perot Group during the time period described above. These employees were paid only from funds of the Perot Group, an unincorporated sole proprietorship, and did not receive any payment from any corporate source.


ROSS CLAYTON MULFORD

Sworn to before me this 17th
day of June, 1994


Notary Public



AFFIDAVIT OF MARK BLAHNIK

Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

I, MARK BLAHNIK, being duly sworn, depose and say:

1. During the period between March, 1992 and November, 1992, I provided services to Perot '92.
2. During the time period described above, I was exclusively employed by the Perot Group and did not receive compensation from any other source. The Perot Group is an unincorporated sole proprietorship owned by Ross Perot created for the purpose of managing Ross Perot's personal affairs.

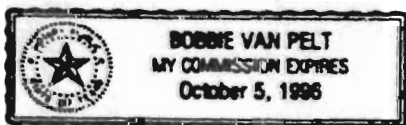
Mark Blahnik

MARK BLAHNIK

Sworn to before me this 20th
day of June, 1994

Bobbie Van Pelt

Notary Public



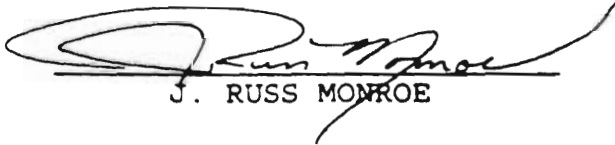
96043720775

AFFIDAVIT OF J. RUSS MONROE

Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

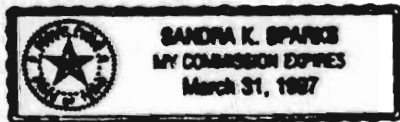
I, J. RUSS MONROE, being duly sworn, depose and say:

1. During the period between March, 1992 and November, 1992, I provided services to Perot '92.
2. During the time period described above, I was exclusively employed by the Perot Group and did not receive compensation from any other source. The Perot Group is an unincorporated sole proprietorship owned by Ross Perot created for the purpose of managing Ross Perot's personal affairs.


J. RUSS MONROE

Sworn to before me this 20th
day of June, 1994


Notary Public



96043720776

AFFIDAVIT OF MIKE POSS

Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

I, MIKE POSS, being duly sworn, depose and say:

1. During the period between March, 1992 and November, 1992, I was the Treasurer of Perot '92.
2. During the time period described above, I was exclusively employed by the Perot Group and did not receive compensation from any other source. The Perot Group is an unincorporated sole proprietorship owned by Ross Perot created for the purpose of managing Ross Perot's personal affairs.

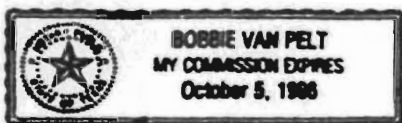
Mike Poss

MIKE POSS

Sworn to before me this 21
day of June, 1994

Bobbie Van Pelt

Notary Public



96043720777

\$50

OFFICE OF EARL BULLOCK, COUNTY CLERK, DALLAS COUNTY, TEXAS
500 MAIN STREET, DALLAS, TEXAS 75202

WITHDRAWAL NOTICE OF AN ASSUMED NAME

NOTICE: This "CERTIFICATE OF WITHDRAWAL," properly executed is to be filed immediately with the County Clerk, as provided by Law

NAME OF BUSINESS BEING ABANDONED

The Perot Group

A801

1248 0000002

ASSESSMENT TOTAL

2331

1:14PM

5.00
5.00
5/18/92

BUSINESS ADDRESS: 12377 Merit Drive, Suite 1700

CITY: Dallas STATE: Texas ZIP CODE: 75251

1. On the Date original Assumed Name was filed in this office: March 18, 1988

2. Name other filing offices, if any, where you filed the same Assumed Name: Tarrant County

Each of the undersigned has this day withdrawn from or disposed of his interest in the above mentioned business and is no longer connected with the same, and will not be responsible for debts contracted by said business after the filing of this Withdrawal Notice as prescribed by law.

NAME Perot Investment Partners, Ltd. SIGNATURE [Signature]
By: H. R. Perot, Jr., General Partner

Address 12377 Merit Drive, Suite 1700, Dallas, Texas Zip Code 75251

NAME H. R. Perot SIGNATURE [Signature]

Address 12377 Merit Drive, Suite 1700, Dallas, Texas Zip Code 75251

NAME H. R. Perot, Jr. SIGNATURE [Signature]

Address 12377 Merit Drive, Suite 1700, Dallas, Texas Zip Code 75251

NAME SIGNATURE

Address Zip Code

NAME SIGNATURE

Address Zip Code

TRUE AND CORRECT

COPY OF ORIGINAL
FILED IN DALLAS
COUNTY CLERK'S OFFICE

THE STATE OF TEXAS

COUNTY OF DALLAS

BEFORE ME THE UNDERSIGNED AUTHORITY, on this day personally appeared H. R. Perot, Jr., General

Partner, Perot Investment Partners, Ltd.

known to me to be the person whose name is subscribed to the foregoing instrument of writing and acknowledged to me that he executed the same for the purposes and considerations therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, on May 18, 1988

(SEAL)

Form No. 405 (Rev. 5-85-77)

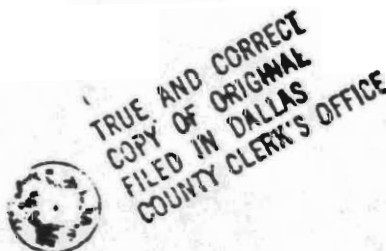
By Deputy

[Signature]
County Clerk, Dallas County, Texas

1988 MAY 18 PM 1:16
COUNTY CLERK
DALLAS COUNTY

96043720738

96043720739



STATE OF TEXAS I, Earl Bullock, County Clerk of
COUNTY OF DALLAS

and for said County and State, do hereby certify that
the above and foregoing is a true and correct copy of
Assumed Name Certificate No. 1248

Assumed Names

as the same appears on file in my office of the
Assumed Name Records of Dallas County, Texas.

WITNESS my hand and seal of office Dallas, Texas this
7th day of March, 1995.

EARL BULLOCK, COUNTY CLERK
DALLAS COUNTY, TEXAS

OFFICE OF EARL BULLOCK, COUNTY CLERK, DALLAS COUNTY, TEXAS
800 MAIN STREET, DALLAS, TEXAS 75202

ASSUMED NAME RECORDS
CERTIFICATE OF OWNERSHIP FOR UNINCORPORATED BUSINESS OR PROFESSION

NOTICE: "CERTIFICATES OF OWNERSHIP" ARE VALID ONLY FOR A PERIOD NOT TO EXCEED 10 YEARS FROM THE DATE FILED
IN THE COUNTY CLERK'S OFFICE. Chapter 28, Sec. 1, Title 4 - Business and Commerce Code

(This certificate properly executed is to be filed immediately with the County Clerk)

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4.00 FISC
1 02/18/80

NAME IN WHICH BUSINESS IS OR WILL BE CONDUCTED

THE PEROT GROUP

BUSINESS ADDRESS 12766 Merit Drive, Suite 1600

CITY: Dallas

STATE Texas

ZIP CODE 75251

PERIOD (not to exceed 10 years) DURING WHICH ASSUMED NAME WILL BE USED 10 YEARS

BUSINESS IS TO BE CONDUCTED AS (Check Which One): ☒ Proprietorship ☐ Sole Practitioner ☐ Joint Venture
☐ General Partnership ☐ Limited Partnership ☐ Real Estate Investment Trust
☐ Joint Stock Company ☐ Other (name type)

CERTIFICATE OF OWNERSHIP

Now, the undersigned, are the owners of the above business and their names and addresses given
are true and correct, and there is no ownership(s) in said business other than those listed herein below.

-NAMES OF OWNERS-

NAME Perot Investment Partners, Ltd. SIGNATURE H.R. Perot, Jr., General Partner

Address 12766 Merit Drive, Suite 1600, Dallas, Texas Zip Code 75251

NAME H.R. Perot SIGNATURE

Address 12766 Merit Drive, Suite 1600, Dallas, Texas Zip Code 75251

NAME H.R. Perot, Jr. SIGNATURE

Address 12766 Merit Drive, Suite 1600, Dallas, Texas Zip Code 75251

NAME SIGNATURE

Address Zip Code

NAME SIGNATURE

Address Zip Code

TRUE AND CORRECT
COPY OF ORIGINAL
FILED IN DALLAS
COUNTY CLERK'S OFFICE

THE STATE OF TEXAS

COUNTY OF DALLAS

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared

H.R. Perot, Jr., General Partner, Perot Investment Partners, Ltd.

known to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me
that he is the owner(s) of the above-named business and that he signed the same for the
purpose and consideration therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, on March 15, 1980

96043720741



STATE OF TEXAS I, Earl Bullock, County Clerk of
COUNTY OF DALLAS

and for said County and State, do hereby certify that
the above and foregoing is a true and correct copy of
Assumed Name Certificate No. 1248

Assumed Names

as the same appears on file in my office of the
Assumed Name Records of Dallas County, Texas.

WITNESS my hand and seal of office Dallas, Texas this
7th day of March, 1995.

EARL BULLOCK, COUNTY CLERK
DALLAS COUNTY, TEXAS

BY Jerome Masendine DEPUTY

26043720742



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date: 3/5/97

✓ Microfilm

 Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED NUR 3963

97043775326



RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

U. S. Department of Justice

MAR 4 1 45 PM '97

Washington, D.C. 20530

FEB 28 1997

Mr. Edward I. Dyck
253 Heather Crest Drive
Chesterfield, Missouri 63017

Dear Mr. Dyck:

This will reply to your correspondence concerning the sufficiency of Federal Election Campaign Act (FECA) disclosure reports that were filed by the Reform Party with the Federal Election Commission (FEC). You specifically question several entries concerning the "purpose" of expenditures that the Party disclosed.

The sufficiency of disclosures made on FECA reports is within the primary jurisdiction of the FEC. Your letter states that you have filed a formal complaint with the FEC seeking administrative enforcement under the terms of the Act, and that the FEC has taken at least a part of your complaint under advisement under the caption MUR-3963.

This is the correct way for a matter of this kind to be addressed. The jurisdiction of the Department of Justice in FECA matters is confined to prosecuting criminal schemes to purposefully violate the prohibitions, duties, and limitations imposed by the FECA on campaign financing. The information you have provided to us does not suggest that such criminal matters are involved here.

97043775327

I appreciate your bringing this matter to our attention. However, I regret that we are unable to assist you further in this matter.

Sincerely,

Craig C. Donsanto
Director, Election Crimes Branch
Public Integrity Section
Criminal Division

cc: Larry Noble
General Counsel
Federal Election Commission

97043775328