



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4316

DATE FILMED 10-9-96 CAMERA NO. 2

CAMERAMAN JM14

9604376013

January 2, 1996

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

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

96043760184



FEDERAL ELECTION COMMISSION

Washington, DC 20463

February 2, 1996

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

Dear Mr. Dyck:

We have received your letter dated January 2, 1996, regarding closed MUR 3963. Your letter states that you have uncovered evidence that certain individuals "lied in their sworn affidavits" to the Commission. Insofar as MUR 3963 has been closed by the Commission, no further action can be taken against the respondents in the context of MUR 3963.

If you would like the Commission to review the allegations contained in your letter of January 2, a formal complaint as described in 2 U.S.C. § 437g(a)(1) must be filed. Requirements of this section of the law, and Commission regulations at 11 C.F.R. § 111.4, which are a prerequisite to Commission action, are detailed below:

- (1) A complaint must be in writing. (2 U.S.C. § 437g(a)(1)).
- (2) Its contents must be sworn to and signed in the presence of a notary public and shall be notarized. (2 U.S.C. § 437g(a)(1)). The notary must indicate as part of the jurat that such swearing occurred. The preferred form is "Subscribed and Sworn to before me on this ____ day of ___, ___."
- (3) A formal complaint must contain the full name and address of the person making the complaint. (11 C.F.R. § 111.4).
- (4) A formal complaint should clearly identify as a respondent each person or entity who is alleged to have committed a violation. (11 C.F.R. § 111.4).
- (5) A formal complaint should identify the source of information upon which the complaint is based. (11 C.F.R. § 111.4).
- (6) A formal complaint should contain a clear and concise recitation of the facts describing the violation of a statute or law over which the Commission has jurisdiction. (11 C.F.R. § 111.4).

96043760135

Edward Dyck
Page 2

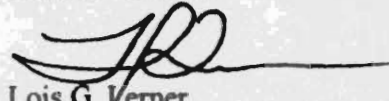
(7) A formal complaint should be accompanied by supporting documentation if known and available to the person making the complaint. (11 C.F.R. § 111.4).

Please note that this matter will remain confidential for a 15 day period to allow you to correct the defects in your complaint. If the complaint is corrected and refiled within the 15 day period, the respondents will be so informed and provided a copy of the corrected complaint. The respondents will then have an additional 15 days to respond to the complaint on the merits. If the complaint is not corrected, the file will be closed and no additional notification will be provided to the respondents.

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: Clay Mulford
Russ Monroe
Mike Poss
Mark Blahnik
Perot '92

96043760186

February 19, 1996

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

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

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

MAR 4 10 32 AM '96

MUR 4316

SUBJECT: Complaint against Ross Perot, The Perot Petition Committee, and Perot '92 for prohibited corporate contributions (in-kind contributions) which is in direct violation of 2 U.S.C. 441b of 11 CFR. In addition, J. Russ Monroe, Mike Poss, Mark Blahnik, and Clayton Mulford submitted FALSE sworn statements to The Federal Election Commission.

Dear Sir:

The Federal Law prohibits excessive corporate contributions in connection with Federal Elections. The Perot Petition Committee and Perot '92 were provided the services of J. Russ Monroe, Mike Poss, and Mark Blahnik without charge while they were on the payroll of a corporation that they are hiding from the FEC.

H. Ross Perot
Mark Blahnik
Mike Poss

all of these individuals and entities
have the following address:

J. Russ Monroe
The Perot Petition Committee
Perot '92

1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

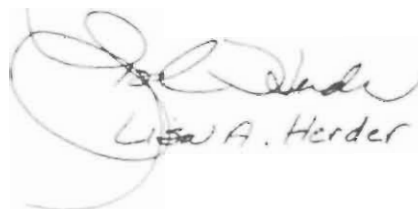
The source of information and supporting documentation are attached.

- A) Abandonment of The Perot Group name 5-18-92
- B) Sworn affidavits of employment by The Perot Group by Blahnik, Poss and Monroe


Edward Dyck

Subscribed and sworn before me on this 23rd day of February 1996.

LISA A. HERDER
NOTARY PUBLIC—STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXPIRES MAY 10, 1999


Lisa A. Herder

2604760137

OFFICE OF EARL BULLOCK, COUNTY CLERK, DALLAS COUNTY, TEXAS
600 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 ABOL

ASSN
TOTL

1246 0000002 2351 1114PM

3.00
5-50
5/12/72

The Perot Group

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 _____

THE STATE OF TEXAS)
COUNTY OF DALLAS)

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

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 12 1988

(SEAL)

From the 455 P.M. Dallas

By [Signature] Deputy
County Clerk

96043760138

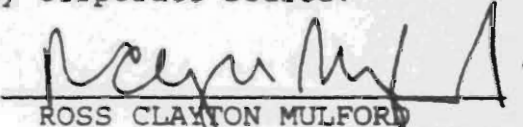
A

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.

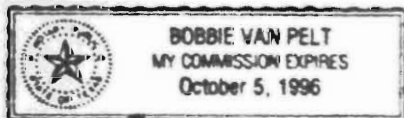
Mark Blahnik

MARK BLAHNIK

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

Bobbie Van Pelt

Notary Public



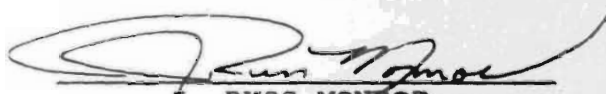
96043760190

AFFIDAVIT OF J. RUSS MONROE

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

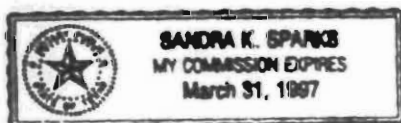
I, J. RUSS MONROE, being duly sworn, depose and say:

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



96043760191

AFFIDAVIT OF MIKE POSS

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

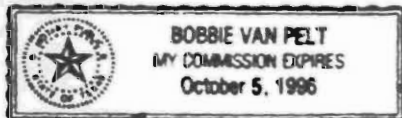
I, MIKE POSS, being duly sworn, depose and say:

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



96043760192



FEDERAL ELECTION COMMISSION

Washington, DC 20463

March 8, 1996

Edward Dyck
253 Heather Creast Drive
Chesterfield, MO 63017

RE: MUR 4316

Dear Mr. Dyck:

This letter acknowledges receipt on March 4, 1996, 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 4316. 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 (Hes)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

9604376013



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 8, 1996

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

RE: MUR 4316

Dear Mr. Perot:

The Federal Election Commission received a complaint which indicates that you 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 4316. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in 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.

If you have any questions, please contact Alva E. Smith 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 (H)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

9604176015



FEDERAL ELECTION COMMISSION

Washington, DC 20463

March 8, 1996

Mike Poss, Treasurer
Perot '96
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

RE: MUR 4316

Dear Mr. Poss:

The Federal Election Commission received a complaint which indicates that Perot '96 ("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 4316. 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.

If you have any questions, please contact Alva E. Smith 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 (JTS)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

96043760127



FEDERAL ELECTION COMMISSION

Washington, DC 20463

March 8, 1996

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

RE: MUR 4316

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that the Perot Petition Committee ("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 4316. 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.

If you have any questions, please contact Alva E. Smith 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 (HES)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

96042760199



FEDERAL ELECTION COMMISSION

Washington, DC 20463

March 8, 1996

J. Ross Monroe
1700 Lakeside Square
12377 Merit Drive
Dallas, TX 75251

RE: MUR 4316

Dear Mr. Monroe:

The Federal Election Commission received a complaint which indicates that you 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 4316. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in 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.

If you have any questions, please contact Alva E. Smith 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 (Hes)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

96043760201



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 8, 1996

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

RE: MUR 4316

Dear Mr. Poss:

The Federal Election Commission received a complaint which indicates that you 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 4316. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in 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.

960437002

If you have any questions, please contact Alva E. Smith 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 (yes)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

96043760203



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 8, 1996

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

RE: MUR 4316

Dear Mr. Blahnik:

The Federal Election Commission received a complaint which indicates that you 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 4316. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in 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.

96043760204

If you have any questions, please contact Alva E. Smith 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 (yes)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

9604376025

HUGHES & LUCE, LLP

Attorneys and Counselors

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

MAR 25 11 55 AM '96

1717 Main Street
Suite 2800
Dallas, Texas 75201
214 / 939-5500
214 / 939-6100 fax

March 20, 1996

Writer's Direct Dial Number

214/939-5579

Other Offices

Austin
Houston
Fort Worth

VIA FAX

Mary L. Taksar, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Ms. Alva E. Smith

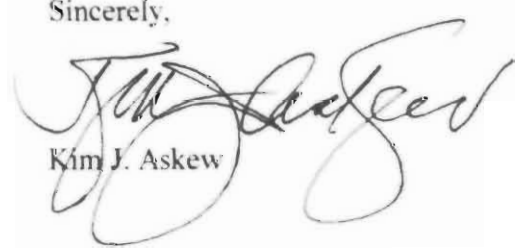
Re: MUR 4316 - J. Russ Monroe

Dear Ms. Taksar:

This letter requests an extension of time of thirty (30) days to respond to the letter dated March 8, 1996, giving notice of the complaint that was filed by Edward Dyck. Because counsel was only recently appointed to this matter, the counsel requires this additional time to review the matter and surrounding facts. Based on the date of receipt, the original response date would be March 23, 1996. If the requested extension is granted, the response will be due April 22, 1996. Enclosed please find a Statement of Designation of Counsel from J. Russ Monroe.

Thank you for your consideration. If you have any questions, please call me.

Sincerely,


Kim J. Askew

Enclosure

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4316

NAME OF COUNSEL: Kim J. Askew

ADDRESS: Hughes & Luce, L.L.P.
1717 Main Street, #2800
Dallas, TX 75201

TELEPHONE: 214-939-5579
214-939-5849 - FAX

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.

March 20, 1995
Date

[Signature]
Signature

RESPONDENT'S NAME: J. Russ Monroe

ADDRESS: 7132 Blackwood Drive
Dallas, TX 75231

HOME PHONE: _____

BUSINESS PHONE: _____

96043760207



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 21, 1996

Kim J. Askew, Esq.
HUGHES & LUCE, L.L.P.
1717 Main Street, Suite 2800
Dallas, TX 75201

RE: MUR 4316
J. Russ Monroe

Dear Ms. Askew:

This is in response to your letter dated March 20, 1996, requesting an extension until April 22, 1996, 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 April 22, 1996.

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

Sincerely,

Alva E. Smith, Paralegal
Central Enforcement Docket

96043760208

MAR 25 11 44 AM '96

Attorneys and Counselors

March 22, 1996

Writer's Direct Dial Number

214-939-5579

Other Offices

Austin
Houston
Fort Worth

VIA FACSIMILE TRANSMISSION: 202/219-3923
& FEDERAL EXPRESS

Mary L. Taksar, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Ms. Alva E. Smith

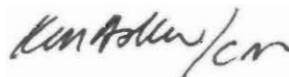
Re: MUR 4316

Dear Ms. Taksar:

By letter dated March 20, 1996, I requested an extension with respect to the above-referred MUR on behalf of Russ Monroe. This letter supplements my letter of March 20, 1996. Mr. Monroe received a notice of complaint dated March 8, 1996, on March 14, 1996, rendering a response due by March 29, 1996. Since that time, Mike Poss, both personally and in his prior capacity as Treasurer of Perot '92, and Mark Blahnik, received complaints, in each case on March 18, 1996. The due date for their response is April 2, 1996. This letter requests an extension of time to respond to these complaints since counsel was only recently appointed to this matter. The extension requested for all respondents to MUR 4316 is April 22, 1996. Enclosed please find Designations of Counsel from Mr. Blahnik, Mr. Poss and Perot '92; a replacement Designation of Counsel, properly executed by J. Russ Monroe to replace that filed with you March 20, 1996, will be delivered by early next week.

Thank you for your consideration. If you have any questions, please call.

Sincerely,



Kim J. Askew

RCM:np
Enclosures

MUR 4316

NAME OF COUNSEL: Kim J. Askew

FIRM: Hughes & Luce, L.L.P.

ADDRESS: 1717 Main Street, #2800

Dallas, Texas 75201

TELEPHONE: (214) 939-5579

FAX: (214) 939-5849

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.

3-22-96
Date

Mike Poss
Signature

RESPONDENT'S NAME: Mike Poss

ADDRESS: 1700 Lakeside Square

12377 Merit Drive

Dallas, Texas 75251

TELEPHONE: HOME

BUSINESS (214) 788-3030

96043760210

MUR 4316NAME OF COUNSEL: Kim J. AskewFIRM: Hughes & Luce, L.L.P.ADDRESS: 1717 Main Street, #2800Dallas, Texas 75201TELEPHONE: (214) 939-5579FAX: (214) 939-5849

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.

3-22-96
DateMike P... TREASURER
SignatureRESPONDENT'S NAME: Perot '92ADDRESS: 1700 Lakeside Square12377 Merit DriveDallas, Texas 75251

TELEPHONE HOME

BUSINESS (214) 788-3030

96043760211

MUR 4316

NAME OF COUNSEL: Kim J. Askew

FIRM: Hughes & Luce, L.L.P.

ADDRESS: 1717 Main Street, #2800

Dallas, Texas 75201

TELEPHONE: (214) 939-5579

FAX: (214) 939-5849

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.

3/22/96
Date

Mark Blahnik
Signature

RESPONDENT'S NAME: Mark Blahnik

ADDRESS: 1700 Lakeside Square

12377 Merit Drive

Dallas, Texas 75251

TELEPHONE: HOME _____

BUSINESS (214) 788-3094

96043760212



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1996

Kim J. Askew, Esq.
HUGHES & LUCE, L.L.P.
1717 Main Street, Suite 2800
Dallas, TX 75201

RE: MUR 4316
Mike Poss, Perot '92, and Mark Blahnik

Dear Ms. Askew:

This is in response to your letter dated March 22, 1996, requesting an extension until April 22, 1996, 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 April 22, 1996.

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

Sincerely,

A handwritten signature in cursive script that reads "Alva E. Smith".

Alva E. Smith, Paralegal
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

96043760213

HUGHES & LUCE, LLP

1717 Main Street
Suite 2800
Dallas, Texas 75201
214 / 939-5500
214 / 939-6100 (fax)

Attorneys and Counselors

March 26, 1996

Writer's Direct Dial Number

214/939-5579

Other Offices

Austin
Houston
Fort Worth

**VIA FACSIMILE TRANSMISSION: 202/219-3923
& REGULAR MAIL**

Mary L. Taksar, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Ms. Alva E. Smith

Re: MUR 4316

Dear Ms. Taksar:

Pursuant to my letter to you dated March 22, 1996, please find enclosed the replacement Designation of Counsel executed by Respondent J. Russ Monroe.

Thank you for your consideration. If you have any questions, please call.

Sincerely,



Kim J. Askew

RCM:np
Enclosures

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
MAR 29 9 56 AM '96

96043760214

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4316

NAME OF COUNSEL: Kim J. Askew

FIRM: Hughes & Luce, L.L.P.

ADDRESS 1717 Main Street #2800

Dallas, Texas 75301

TELEPHONE: (214) 939-5579

FAX: (214) 939-5849

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

Date _____

Signature

RESPONDENT'S NAME: J. Russ Monroe

ADDRESS: 1700 Lakeside Square

12377 Merit Drive

Dallas Texas 75251

TELEPHONE: HOME

BUSINESS (214) 746-5393

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

MAR 29 9 56 AM '96

96043760215

HUGHES & LUCE, LLP
tr

REC'D
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

1717 Main Street
Suite 2800
Dallas, Texas 75201
214 / 939-5500
214 / 939-6100 / fax

APR 22 10 46 AM '96

Attorneys and Counselors

April 16, 1996

Waller's Direct Dial Number

214/939-5579

Other Offices

Austin
Houston
Fort Worth

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

Attn: Mary L. Taksar, Esq.

Re: MUR 4316

Dear Ms. Taksar:

This letter is filed in response to your letter dated March 8, 1996, notifying Mark Blahnik, Mike Poss, and Russ Monroe of a complaint filed against them by Edward Dyck. This issue was addressed originally as MUR 3963 brought by Mr. Dyck in May 1994 alleging the receipt of in-kind "corporate contributions from The Perot Group in the form of employees loaned to the campaign."

We again state, as was stated in response to MUR 3963, that each of the individuals named in this complaint, Mark Blahnik, Mike Poss, and Russ Monroe, were at all times employed personally by Ross Perot. All consideration to them was from Mr. Perot's personal funds and properly and timely recorded and disclosed on FEC filings as in-kind contributions from Ross Perot to Perot '92. Mr. Dyck seems to allege that the filing and subsequent withdrawal of an assumed name certificate in a Texas county somehow is an indication that a corporation employed these individuals or that a corporation existed related to or employing these individuals. That is incorrect. There is no corporation involved and there never was a corporation involved. Indeed, the filing and termination of an assumed name certificate has nothing to do with a corporation.

Messrs. Blahnik, Poss and Monroe were at all times direct employees of Mr. Perot and paid from Mr. Perot's personal funds under the sole proprietorship of The Perot Group. None were employed by corporations. All costs to Mr. Perot associated with the employment of the individuals were properly recorded on FEC filings as in-kind contributions from Mr. Perot.

Not a Limited Liability Partnership Including Professional Corporations

03060 0284 0150919 02

HUGHES & LUCE, L.L.P.

Federal Election Commission

April 16, 1996

Page 2

Mr. Dyck has raised a number of complaints and filed numerous lawsuits against Mr. Perot, and is currently the plaintiff in at least two lawsuits against Mr. Perot. The Commission should not permit use of its facilities and resources for the pursuit of Mr. Dyck's personal vendetta.

If you have any questions regarding the foregoing, please do not hesitate to contact me at 214/939-5579.

Sincerely,



Kim J. Askew

KJA:bjh

96043760217

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
WASHINGTON, D.C. 20543

BEFORE THE FEDERAL ELECTION COMMISSION

AUG 14 4 50 PM '96

In the Matter of

)
)
)

Enforcement Priority

SENSITIVE

GENERAL COUNSEL'S REPORT

I. INTRODUCTION

In accordance with the objectives of the Enforcement Priority System ("EPS") adopted by the Commission in May 1993, the Office of the General Counsel has periodically recommended that the Commission not pursue cases that are stale or that, in comparison to other pending matters, do not appear to warrant the use of the Commission's limited resources. This General Counsel's Report recommends the Commission not pursue 43 cases that fall within these categories.

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 Commission resources. Each incoming matter is evaluated using Commission-approved criteria and cases that, based on their rating, do not warrant pursuit relative to other pending cases are placed in this category. By closing such cases, the Commission is able to use its limited resources to focus on more important cases.

96043760218

Having evaluated incoming matters, this Office has identified 24 cases which do not warrant further pursuit relative to other pending matters.¹ 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. Attachments 1-24. As the Commission has previously requested, we have also attached responses and referral materials where that information has not been circulated previously to the Commission. Attachment 25.

B. Stale Cases

Investigations are severely impeded and require relatively greater resources when the activity, and the evidence of the activity, are old. Accordingly, the Office of the 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 19 cases that

this Office believes are now too old to warrant the use of the Commission's resources

¹ These matters are: MUR 4227 (Wellstone for Senate) (Attachment 1); MUR 4273 (Jesse Wineberry) (Attachment 2); MUR 4290 (Lincoln Club of Riverside County) (Attachment 3); MUR 4292 (Congressman Ron Packard) (Attachment 4); MUR 4293 (Willie Colon for Congress) (Attachment 5); MUR 4294 (Alan Keyes for President '96) (Attachment 6); MUR 4299 (UAW-V-CAP) (Attachment 7); MUR 4312 (Sonoma County Republicans) (Attachment 8); MUR 4316 (Ross Perot) (Attachment 9); MUR 4318 (Patrick Combs for Congress) (Attachment 10); MUR 4324 (Buchanan for President) (Attachment 11); MUR 4325 (Dan Garstecki for Congress '96) (Attachment 12); MUR 4329 (Golden Door) (Attachment 13); MUR 4330 (Trice Harvey) (Attachment 14); MUR 4333 (WSB-TV) (Attachment 15); MUR 4334 (Cox Communications) (Attachment 16); MUR 4336 (WSB-TV) (Attachment 17); MUR 4339 (WSB-TV) (Attachment 18); MUR 4348 (Soglin for Congress) (Attachment 19); MUR 4359 (Francis Thompson for Congress) (Attachment 20); MUR 4360 (Weygand Committee) (Attachment 21); MUR 4363 (WSB-TV) (Attachment 22); MUR 4364 (Friends of Jimmy Blake) (Attachment 23) and Pre-MUR 328 (Department of the Interior) (Attachment 24).

96043760219

Because our recommendation not to pursue these cases is based on their staleness, this Office has not prepared separate narratives for these cases. we have attached responses and referral materials in those instances where the information was not previously circulated. Attachments 26-45.

This Office recommends the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective September 3, 1996. By closing the cases effective that day, CED and the Legal Review Team each will have the necessary time to prepare closing letters and case files for the public record.

96043760220

III. RECOMMENDATIONS

A. Decline to open a MUR, close the file effective September 3, 1996, and approve the appropriate letters in the following matters:

- 1) Pre-MUR 293
- 2) Pre-MUR 311
- 3) Pre-MUR 328
- 4) RAD Referral 95L-03
- 5) RAD Referral 95L-11
- 6) RAD Referral 95L-16
- 7) RAD Referral 95L-22
- 8) RAD Referral 95NF-21

B. Take no action, close the file effective September 3, 1996, and approve the appropriate letters in the following matters:

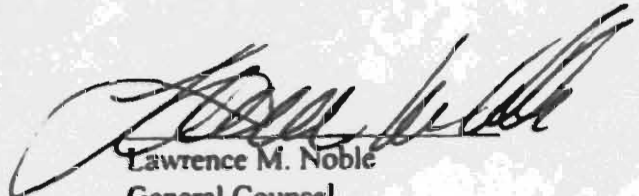
- 1) MUR 4061
- 2) MUR 4074
- 3) MUR 4101
- 4) MUR 4146
- 5) MUR 4151
- 6) MUR 4175
- 7) MUR 4180
- 8) MUR 4184
- 9) MUR 4198
- 10) MUR 4201
- 11) MUR 4227
- 12) MUR 4232
- 13) MUR 4273
- 14) MUR 4290
- 15) MUR 4292
- 16) MUR 4293
- 17) MUR 4294
- 18) MUR 4299
- 19) MUR 4312
- 20) MUR 4316
- 21) MUR 4318
- 22) MUR 4324
- 23) MUR 4325
- 24) MUR 4329
- 25) MUR 4330
- 26) MUR 4333
- 27) MUR 4334

9 6 0 4 3 7 6 0 2 2 1

- 28) MUR 4336
- 29) MUR 4339
- 30) MUR 4348
- 31) MUR 4359
- 32) MUR 4360
- 33) MUR 4363
- 34) MUR 4364

C. Take no further action, close the file effective September 3, 1996, and approve the appropriate letters in MUR 3826.

8/14/96
Date


Lawrence M. Noble
General Counsel

96043760222

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Enforcement Priority.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 21, 1996, the Commission took the following actions on the General Counsel's August 14, 1996 report on the above-captioned matter:

1. Decided by a vote of 5-0:

A. Decline to open a MUR, close the file effective September 3, 1996, and approve the appropriate letters in each of the following matters:

- 1) Pre-MUR 293
- 2) Pre-MUR 311
- 3) Pre-MUR 328
- 4) RAD Referral 95L-03
- 5) RAD Referral 95L-11
- 6) RAD Referral 95L-16
- 7) RAD Referral 95L-22
- 8) RAD Referral 95NF-21

B. Take no action, close the file effective September 3, 1996, and approve the appropriate letters in each of the following matters:

- 1) MUR 4061
- 2) MUR 4074
- 3) MUR 4101
- 4) MUR 4146
- 5) MUR 4151
- 6) MUR 4175
- 7) MUR 4180
- 8) MUR 4184
- 9) MUR 4198

(continued)

96043760223

Federal Election Commission
Certification for Enforcement
Priority
August 23, 1996

Page 2

10) MUR 4227
11) MUR 4232
12) MUR 4273
13) MUR 4290
14) MUR 4292
15) MUR 4293
16) MUR 4294
17) MUR 4299
18) MUR 4312
19) MUR 4316
20) MUR 4318
21) MUR 4324
22) MUR 4325
23) MUR 4329
24) MUR 4330
25) MUR 4333
26) MUR 4334
27) MUR 4336
28) MUR 4339
29) MUR 4348
30) MUR 4359
31) MUR 4360
32) MUR 4363
33) MUR 4364

Commissioners Aikens, Elliott, McDonald,
McGarry, and Thomas voted affirmatively with
respect to each of the above-noted matters.

Attest:

8-26-96
Date

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

Received in the Secretariat: Wed., Aug. 14, 1996 4:56 p.m.
Circulated to the Commission: Fri., Aug. 16, 1996 12:00 p.m.
Deadline for vote: Wed., Aug. 21, 1996 4:00 p.m.

bjr

26043760224



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

SEP 06 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Edward Dyck
253 Heather Creast Drive
Chesterfield, MO 63017

RE: MUR 4316

Dear Mr. Dyck:

On March 4, 1996, 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 on September 3, 1996. 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,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Attachment
Narrative

96043760225

MUR 4316
THE PEROT GROUP

Edward Dyck filed a complaint alleging that the Perot Petition Committee and Perot '92 were provided the employment services of J. Russ Monroe, Mike Poss and Mark Blahnik without charge while they were on the payroll of a corporation. He also alleges that the sworn affidavits provided to the FEC in a related matter, MUR 3963, were false.⁴ Mr. Dyck bases his allegations on a copy of a certificate from the Dallas County Clerk's Office indicating that use of the name "The Perot Group" was abandoned by Mr. Perot in 1992.

In response, Perot '92 and Messrs. Monroe, Poss and Blahnik reiterate that each of the individuals was at all times employed personally by Mr. Perot through The Perot Group, an unincorporated sole proprietorship. They further state that all payments to the three employees were from Mr. Perot's personal funds and properly and timely recorded and disclosed on FEC filings as in-kind contributions from Ross Perot to Perot '92. Finally, they state that there is no corporation involved, that there never was a corporation involved, and question the relevance of the termination of an assumed name certificate to the issue of whether a corporation paid the three employees' salaries.

There is no evidence the activity had significant impact on the process and the matter is less significant relative to other matters pending before the Commission.

⁴ MUR 3963 involved a complaint filed by Mr. Dyck alleging that eight employees of Perot '92 were loaned from The Perot Group, resulting in an illegal in-kind contribution from The Perot Group to Perot '92. The respondents stated that five of the employees were employed exclusively by Perot '92, either directly or through a temporary services agency, and that the remaining three employees were paid by The Perot Group, Mr. Perot's unincorporated sole proprietorship. The Commission closed MUR 3963 on September 27, 1994 without taking any action.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEP 06 1996

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

RE: MUR 4316

Dear Sir or Madam:

On March 8, 1996, 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 Petition Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on September 3, 1996.

The confidentiality provisions of 2 U.S.C. § 437(g)(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,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Attachment
Narrative

96043760227

MUR 4316
THE PEROT GROUP

Edward Dyck filed a complaint alleging that the Perot Petition Committee and Perot '92 were provided the employment services of J. Russ Monroe, Mike Poss and Mark Blahnik without charge while they were on the payroll of a corporation. He also alleges that the sworn affidavits provided to the FEC in a related matter, MUR 3963, were false.⁴ Mr. Dyck bases his allegations on a copy of a certificate from the Dallas County Clerk's Office indicating that use of the name "The Perot Group" was abandoned by Mr. Perot in 1992.

In response, Perot '92 and Messrs. Monroe, Poss and Blahnik reiterate that each of the individuals was at all times employed personally by Mr. Perot through The Perot Group, an unincorporated sole proprietorship. They further state that all payments to the three employees were from Mr. Perot's personal funds and properly and timely recorded and disclosed on FEC filings as in-kind contributions from Ross Perot to Perot '92. Finally, they state that there is no corporation involved, that there never was a corporation involved, and question the relevance of the termination of an assumed name certificate to the issue of whether a corporation paid the three employees' salaries.

There is no evidence the activity had significant impact on the process and the matter is less significant relative to other matters pending before the Commission.

⁴ MUR 3963 involved a complaint filed by Mr. Dyck alleging that eight employees of Perot '92 were loaned from The Perot Group, resulting in an illegal in-kind contribution from The Perot Group to Perot '92. The respondents stated that five of the employees were employed exclusively by Perot '92, either directly or through a temporary services agency, and that the remaining three employees were paid by The Perot Group, Mr. Perot's unincorporated sole proprietorship. The Commission closed MUR 3963 on September 27, 1994 without taking any action.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

SEP 06 1996

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

RE: MUR 4317

Dear Mr. Perot

On March 8, 1996, 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 you. See attached narrative. Accordingly, the Commission closed its file in this matter on September 3, 1996.

The confidentiality provisions of 2 U.S.C. § 437g(a)(2) 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

Colleen T. Sealander, Attorney
Central Enforcement Docket

Attachment
Narrative

Celebrating the Commission's 25th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

96043760229

MUR 4316
THE PEROT GROUP

Edward Dyck filed a complaint alleging that the Perot Petition Committee and Perot '92 were provided the employment services of J. Russ Monroe, Mike Poss and Mark Blahnik without charge while they were on the payroll of a corporation. He also alleges that the sworn affidavits provided to the FEC in a related matter, MUR 3963, were false.⁴ Mr. Dyck bases his allegations on a copy of a certificate from the Dallas County Clerk's Office indicating that use of the name "The Perot Group" was abandoned by Mr. Perot in 1992.

In response, Perot '92 and Messrs. Monroe, Poss and Blahnik reiterate that each of the individuals was at all times employed personally by Mr. Perot through The Perot Group, an unincorporated sole proprietorship. They further state that all payments to the three employees were from Mr. Perot's personal funds and properly and timely recorded and disclosed on FEC filings as in-kind contributions from Ross Perot to Perot '92. Finally, they state that there is no corporation involved, that there never was a corporation involved, and question the relevance of the termination of an assumed name certificate to the issue of whether a corporation paid the three employees' salaries.

There is no evidence the activity had significant impact on the process and the matter is less significant relative to other matters pending before the Commission.

⁴ MUR 3963 involved a complaint filed by Mr. Dyck alleging that eight employees of Perot '92 were loaned from The Perot Group, resulting in an illegal in-kind contribution from The Perot Group to Perot '92. The respondents stated that five of the employees were employed exclusively by Perot '92, either directly or through a temporary services agency, and that the remaining three employees were paid by The Perot Group, Mr. Perot's unincorporated sole proprietorship. The Commission closed MUR 3963 on September 27, 1994, without taking any action.

9604376020



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SEP 06 1996

Kim J. Askew, Esq.
HUGHES & LUCE, L.L.P.
1717 Main Street, #2800
Dallas, TX 75201

RE: MUR 4316

J. Ross Monroe, Mike Poss, Perot '92, Mike Poss, as treasurer, and Mark Blahnik

Dear Ms. Askew

On March 8, 1996, the Federal Election Commission notified your clients, J. Ross Monroe, Mike Poss, Perot '92, and Mark Blahnik, 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 your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on September 3, 1996.

The confidentiality provisions of 2 U.S.C. § 437g(a)(2) 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,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Attachment
Narrative

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

96043760231

MUR 4316
THE PEROT GROUP

Edward Dyck filed a complaint alleging that the Perot Petition Committee and Perot '92 were provided the employment services of J. Russ Monroe, Mike Poss and Mark Blahnik without charge while they were on the payroll of a corporation. He also alleges that the sworn affidavits provided to the FEC in a related matter, MUR 3963, were false.⁴ Mr. Dyck bases his allegations on a copy of a certificate from the Dallas County Clerk's Office indicating that use of the name "The Perot Group" was abandoned by Mr. Perot in 1992.

In response, Perot '92 and Messrs. Monroe, Poss and Blahnik reiterate that each of the individuals was at all times employed personally by Mr. Perot through The Perot Group, an unincorporated sole proprietorship. They further state that all payments to the three employees were from Mr. Perot's personal funds and properly and timely recorded and disclosed on FEC filings as in-kind contributions from Ross Perot to Perot '92. Finally, they state that there is no corporation involved, that there never was a corporation involved, and question the relevance of the termination of an assumed name certificate to the issue of whether a corporation paid the three employees' salaries.

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⁴ MUR 3963 involved a complaint filed by Mr. Dyck alleging that eight employees of Perot '92 were loaned from The Perot Group, resulting in an illegal in-kind contribution from The Perot Group to Perot '92. The respondents stated that five of the employees were employed exclusively by Perot '92, either directly or through a temporary services agency, and that the remaining three employees were paid by The Perot Group, Mr. Perot's unincorporated sole proprietorship. The Commission closed MUR 3963 on September 27, 1994 without taking any action.

96043760232

September 13, 1996

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

Colleen T. Sealander, Attorneye
Central Enforcement Docket
Federal Election Commission
Washington D.C. 20463

CLOSED

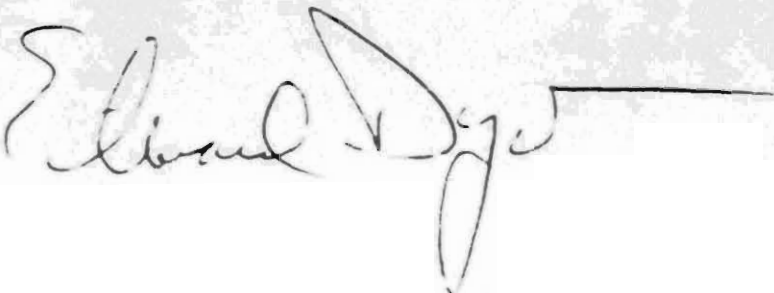
RE: MUR 4316 letters enclosed

Dear Ms. Sealander:

You missed the point of my complaint. That "point" is that "Messrs. Monroe, Poss and Blahnik LIED UNDER OATH to the Federal Election Commission. Are you condoning this dishonesty because of Ross Perot? Does the FE~~6~~ condone DISHONESTY? Do you?

Think this over because this is an ELECTION YEAR!

Yours very sincerely,



RECEIVED
FEDERAL ELECTION
COMMISSION
SEP 16 12 26 PM '96

9604376023

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.

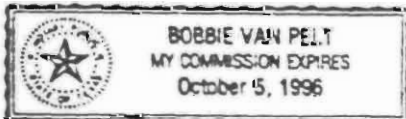
Mark Blahnik

MARK BLAHNIK

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

Bobbie Van Pelt

Notary Public

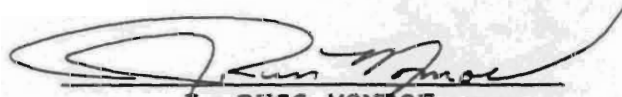


AFFIDAVIT OF J. RUSS MONROE

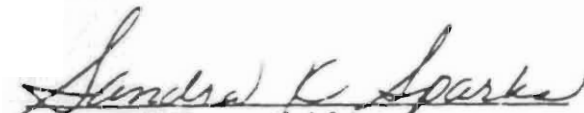
Re: MUR 3963 - Perot '92 and Mike Poss, as Treasurer

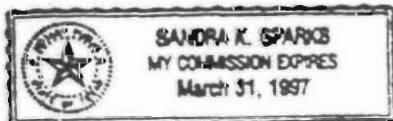
I, J. RUSS MONROE, being duly sworn, depose and say:

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





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

September 18, 1996

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

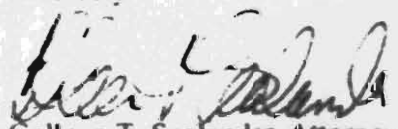
RE: MUR 4316

Dear Mr. Perot:

The letter dated September 6, 1996, informing you that the Commission closed its file in Matter Under Review 4317 contained a typographical error. It should have referenced MUR 4316 instead of MUR 4317.

We apologize for any inconvenience we may have caused. If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,


Colleen T. Sealander, Attorney
Central Enforcement Docket



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4816

DATE FILMED 10-9-96 CAMERA NO. 2

CAMERAMAN JMN

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