



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 4631

DATE FILMED 3/25/98 CAMERA NO. 2

CAMERAMAN EES

98043863111

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1944-45 17th

MUR 4631

Dear Sir:

I am filing this complaint against Ross Perot (Presidential Candidate for Perot '92, FEC ID No. C00263145) and Mike Poss (Treasurer and Records Custodian for Perot '92) for filing false statements with the FEC, "funneling" private funds through the FEC reporting system to conceal legal relationships, and a general conspiracy to defraud the FEC. Sandra McClure and her lawyers Alan Kohn and John Lemkemeier, willingly and knowingly participated or conspired in this action by Ross Perot and Mike Poss. The monies "funneled" from Ross Perot's personal accounts through the FEC reporting system to Sandra McClure, Alan Kohn, and John Lemkemeier were not "qualified campaign expenses" as defined in CFR 11. The BURDEN OF PROOF lies with the above named individuals to prove that the monies identified in this complaint are qualified campaign expenses per CFR 11. It is unlawful for any person knowingly and willfully to furnish any false, fictitious or fraudulent evidence, books, or information to the Federal Election Commission (CFR 11).

Mike Poss, Treasurer of Perot '92, per CFR 11 is responsible for the "committee's" compliance with Federal campaign finance law. As a lawyer and accountant, Mr. Poss possesses more understanding of his responsibilities and the law than necessary to execute the duties of this position.

Why would The Perot Petition Committee pay legal expenses for an individual that is not part of the "committee", and has no relationship with The Perot Petition Committee. Ross Perot or Mike Posa? The question now arises, is this money a "kickback"? It is unlawful for any person to knowingly and willingly give or accept any kickback or any illegal payment in connection with any campaign expense (CFR 11).

Page 1

9 8 0 4 3 0 6 1 1 3

legal counsel in Missouri) for **\$9,839.06** on May 1, 1995 for "Legal Services." This is **NOT** a "**qualified campaign expense**" because both Perot and Poss have given sworn statements that they and The Perot Petition Committee (Perot '92, ID No. C00263145) had no relationship whatsoever with McClure.

- **Exhibits B** is a certified copy of Perot '92 itemized disbursements to Kohn, Shands, Elbert, Gianoulakis & Giljum (Sandra McClure's personal legal counsel in Missouri) for **\$529.89** on October 27, 1995 for "Legal Services." This is **NOT** a "**qualified campaign expense**" because both Perot and Poss have given sworn statements that they and The Perot Petition Committee (Perot '92, ID No. C00263145) had no relationship whatsoever with McClure.

- **Exhibits C** is a certified copy of Perot '92 itemized disbursements to Kohn, Shands, Elbert, Gianoulakis & Giljum (Sandra McClure's personal legal counsel in Missouri) for **\$299.74** on December 28, 1995 for "Legal Services." This is **NOT** a "**qualified campaign expense**" because both Perot and Poss have given sworn statements that they and The Perot Petition Committee (Perot '92, ID No. C00263145) had no relationship whatsoever with McClure.

- **Exhibit D** is the Itemized Receipts Form (FEC) for Perot '92 (ID No. C00263145) showing a receipt of \$155,734.53 from Ross Perot on May 1, 1995. This is the very same day that the **\$9,839.89** referred to above in Exhibit A is disbursed to Sandra McClure's personal legal counsel (Kohn, Shands, Elbert, Gianoulakis & Giljum).

- **Exhibit E** is the Itemized Receipts Form (FEC) for Perot '92 (ID No. C00263145) showing receipts of \$40,937.72 on December 22, 1995 and \$1,024,309.18 on December 31, 1995. Both Exhibits D and E show monies going directly from the personal accounts of Ross Perot (the individual who formed The Perot Petition Committee) to the FEC account (ID No. C00263145).

Exhibits A through E clearly show Ross Perot's "**funneling**" of his private monies through the FEC reporting system to Kohn, Shands, Elbert, Gianoulakis & Giljum to conceal his direct relationship to Sandra McClure and an attempt to clear himself of liability for Sandra McClure's actions in 1992. This is defrauding the FEC and the payments of Ms. McClure's personal legal expenses should be considered a "**kickback**" by the FEC.

- **Exhibit F** is the sworn deposition of Mike Poss taken on May 29, 1996. Poss again is the Treasurer of The Perot Petition Committee and Perot '92, and the Records Custodian, who was responsible for the accuracy of the reports filed with the FEC. On page 137 Mike Poss was asked, "**Did The Perot Petition Committee ever operate in the state of Missouri?**" Mr. Poss answered, "No." On page 139 Mike Poss was asked, "**Did The Perot Petition Committee assist them (Missouri) in conducting the petition drive?**" Mr. Poss answered,

"No." On page 144 Poss was asked, "How about Ms. McClure? Did you ever hire Ms. McClure as part of The Perot Petition Committee?" Mr. Poss answered, "No." Again on page 145 Mike Poss is asked, "Did you ever hire, as part of The Perot Petition Committee, Ms. McClure, Sandra McClure?" Mr. Poss answered, "No."

Contrary to the above sworn testimony of Mike Poss in Federal Court, **Exhibits G-1, G-2** show certified amendments to The Perot Petition Committee (FEC ID No. C00263145) **Statement of Organization**, pursuant to 11 C.F.R. §102.2, that include Missouri banks as additional banks or depositories in which the Perot Petition Committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

- **Exhibit H** is the sworn deposition of Sandra McClure taken on May 23, 1996. On page 206 Sandra McClure is asked under oath, "Mrs. McClure, when you were engaged in your activities on behalf of Missouri for Perot in March, April and June of 1992, were you at any time acting on behalf of the Perot Petition Committee in Dallas?" Mrs. McClure answered, "No."
- **Exhibit I** is a letter from Ross Perot to the FEC dated March 20, 1992, stating that he is forming the Perot Petition Committee in the same building as his regular office in Dallas, Texas.
- **Exhibit J** is the Employment Affidavit of Mike Poss showing he was exclusively employed in 1992 by the Perot Group, that is an unincorporated sole proprietorship owned by Ross Perot and created for the purpose of managing Ross Perot's personal affairs.

The following individuals may have made false statements to the Federal Election Commission, "funneled" private funds through the FEC system to defraud and conceal legal relationships, and defrauded the FEC with "unqualified campaign expenses."

Ross Perot (1992 Presidential Candidate, FEC ID No. C00263145))	
10444 Strait Lane	or 1700 Lakeside Square
Dallas, Texas 75229	12377 Merit Drive
1-800-96-PARTY	Dallas, Texas 75251

(Perot employee and Treasurer of the Perot Petition Committee and Perot '92 - FEC ID No. C00263145)	
James Michael Poss	
6405 Mercedes Avenue	or 1700 Lakeside Square
Dallas, Texas 75214	12377 Merit Drive
1-800-96-PARTY	Dallas, Texas 75251

Mr. Perot and Mr. Poss need to explain in detail to the Federal Election Commission to the best of their knowledge and under oath the following:

9 8 0 4 3 8 6 3 1 5

- Describe in detail all that you know about Exhibit A (Disbursement of \$9,839.06 for "Legal Services" to Kohn, Shands, Elbert, Gianoulakis & Giljum on May 1, 1995). Both Ross Perot and Mike Poss have stated under oath that they did nothing in Missouri, and that they didn't know Sandra McClure. Why is Ross Perot personally paying Sandra McClure's personal lawyers out of his pocket and "funneling" the funds through the FEC reporting system? In addition, detail all other payments on this page (Exhibit A) for the other law firms listed.

- Describe in detail all that you know about Exhibit B (Disbursement of \$529.86 for "Legal Services" to Kohn, Shands, Elbert, Gianoulakis & Giljum on October 27, 1995) and Exhibit C (Disbursement of \$299.74 for "Legal Services" to Kohn, Shands, Elbert, Gianoulakis & Giljum on December 28, 1995). Why is Ross Perot continuing to pay McClure's personal legal fees to her personal lawyers out of his own pocket and "funneling" funds through the FEC reporting system? In addition, detail all other payments on these pages (Exhibits B and C) for the other law firms listed.

- Describe in detail all that you know about Exhibits D and E. Why did Ross Perot personally contribute these funds? What was the purpose and to what ends were they going?

- Why did Ross Perot and Mike Poss "distance" themselves from Sandra McClure and Missouri (reference Exhibit F)? Why did Mr. Poss make these UNTRUE statements under oath and threat of perjury, which were completely contrary to his certified FEC amendments to the Perot Petition Committee's **Statement of Organization**.

- Reference Exhibits G-1 and G-2, why did Mike Poss set up bank accounts in Missouri for the Perot Petition Committee in May and June of 1992? Why was the bank account moved from Central Bank of Jefferson City, Missouri to the Commerce Bank, Springfield, Missouri? Describe in detail all monies deposited in these Missouri Banks from Ross Perot, The Perot Petition Committee, or any entity thereof (include dates of all deposits). Explain why these deposits into Missouri banks were not reported to the FEC.

- Why weren't the Perot monies listed in Exhibits A, B, and C paid directly to Sandra McClure?

The following individuals have knowingly received "unqualified campaign expenses" (monies "funneled" through the FEC) and have knowledge of a "cover-up" in the relationship between Ross Perot, The Perot Petition Committee and Sandra McClure:

Sandra Stone McClure
7439 East Farm Road, 1-70
Rogersville, Missouri 65742

Alan C. Kohn (McClure's personal lawyer)
Kohn, Shands, Elbert, Gianoulakis & Giljum
One Mercantile Center
St. Louis, Missouri 63101

John W. Lemkemeier (McClure's personal lawyer, formerly with Kohn,
Bryan Cave Shands, Elbert, Gianoulakis & Giljum)
One Metropolitan Square
St. Louis, Missouri 63101

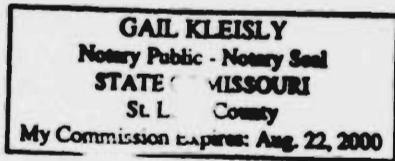
Sandra McClure, Alan Kohn and John Lemkemeier should explain to the Federal Election Commission their knowledge of the following:

- Reference Exhibits A, B, and C, why was Ross Perot's personal money "funneled" through the FEC to Kohn, Shands, Elbert, Gianoulakis & Giljum, as opposed to paying McClure directly? What other monies were "funneled" to Sandra McClure, Alan Kohn or John Lemkemeier through the FEC other than those shown in Exhibits A, B, and C.
- Explain why Ross Perot personally is paying your legal bills for actions Sandra McClure took when Ross Perot, Mike Poss and The Perot Petition Committee had ever heard of nor met her? Explain in detail why Ross Perot's lawyer, Ms. Kim Askew, would not disclose that Ross Perot is paying your personal legal bills (Exhibit H, page 158, lines 9-10). Also explain why McClure's personal lawyer, Alan Kohn, would not let his client answer the same question (Exhibit P, page 158, lines 5-8).
- Explain the relationship between Sandra McClure, Ross Perot, Mike Poss and The Perot Petition Committee (FEC ID No. C00263145).
- Explain in detail all you know about the opening of bank accounts at Central Bank of Jefferson City, Missouri and Commerce Bank of Springfield, Missouri in 1992 for the Perot Petition Committee (Reference Exhibits G-1 and G-2).
- Explain in detail all you know about the "Perot Petition Committee (dba) Mo for Perot", Federal Tax ID Number and the bank account opened at Commerce Bank in Springfield, Missouri on April 22, 1992. Describe the sources of all monies deposited in this bank account.
- Reference Exhibit H, why did McClure deny any relationship with the Perot Petition Committee in March through June of 1992 (page 206, lines 15-25).

Yours very sincerely,


Edward I. Dyck

Subscribed and sworn before me on this 15th day of April, 1997.



Gail Kleisly

Perot '92

7616 I.R.J. Freeway, Suite 727, Dallas, Texas 75251
Telephone (214) 450-8800

Jan 10 11 15 AM '95

Mike Poss
Treasurer

~~Direct Fund Member~~
(214) 788-3838

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

July 14, 1995

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

Re: Perot '92/ID No. C00263145

Ladies and Gentlemen:

Enclosed please find the 2nd Quarter Report for the period April 1, 1995 through June 30, 1995 of Perot '92 (ID No. C00263145).

Please file stamp the enclosed additional copy of this letter with attachments and return it to me in the enclosed envelope.

Very truly yours,

Mike Poss

Mike Poss
Treasurer

JMP/lb
Enclosures

EXHIBIT

REPORT OF RECEIPTS AND DISBURSEMENTS
BY AN AUTHORIZED COMMITTEE OF A
CANDIDATE FOR THE OFFICE OF PRESIDENT

Jul 18 11 15 AM '95

NOTE: This report is to be used by an authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.

USE FEC MAILING LABEL OR TYPE OR PRINT	1. NAME OF COMMITTEE (in full) Perot '92	2. IDENTIFICATION NUMBER C00263145
	ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1700 Lakeside Square, 12377 Merit Drive	3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General
	CITY, STATE and ZIP CODE Dallas, Texas 75251	

4. TYPE OF REPORT ("X" appropriate box and complete, if applicable)	<input type="checkbox"/> Amendment for (Report) <input type="checkbox"/> Monthly Report (month)	<input type="checkbox"/> Twelfth Day Before Election
	<input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> January 31 Year-end Report	<input type="checkbox"/> Thirtieth Day After Election
	<input checked="" type="checkbox"/> July 18 Quarterly Report <input type="checkbox"/> Termination Report	TYPE OF ELECTION Presidential
	<input type="checkbox"/> October 15 Quarterly Report	STATE TX ELECTION DATE 11/3/92

COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS

5. COVERING PERIOD	FROM April 1, 1995	THROUGH June 30, 1995
SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	981,761.78
	7. TOTAL RECEIPTS THIS PERIOD (From Line 22 Column A)	155,734.53
	8. SUBTOTAL (Add Line 6 and 7)	1,137,496.31
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30 Column A)	145,059.36
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)	992,436.95
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)	1,475.00
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)	1,938,407.07
	13. EXPENDITURES SUBJECT TO LIMITATION (From FEC Form 3P, Page 4)	
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d Column B from 17a Column B)	220,734.53
	15. NET OPERATING EXPENDITURES (Subtract Line 20a Column B from 23 Column B)	210,059.36

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

TYPE OR PRINT NAME OF TREASURER Mike Pose		For further information, contact: Federal Election Commission Toll Free 888-434-6530 Local 376-3120
SIGNATURE OF TREASURER <i>Mike Pose</i>	DATE 7/14/95	
NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g. All previous versions of FEC Form 3P are obsolete and should no longer be used.		

FEC FORM 3P (12/93)

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I hereby certify that this document is a complete and accurate copy of the original document on file with the Federal Election Commission.

4/10/97
Date
Michael G. Dickerson
Chief, Public Records

This is not the complete report but contains the information requested.

(PAGE 2, FEC FORM 3P)

98,043,22,122,

SCHEDULE B-P

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

ITEMIZED DISBURSEMENTS

Use separate
schedules for
each category
of the detailed
summary page

PAGE 1
LINE NUMBER 23

OF DISBURSEMENTS 2

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.

DATE
MONTH,
DAY,
YEAR)

AMOUNT
OF EACH
DISBURSEMENT
THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE

Armstrong, Teasdale,
Schlafly & Davis
One Metropolitan Square, Suite 2600
St. Louis, MO 63102-2740

PURPOSE OF DISBURSEMENT

Legal Services

5/1/95

5,202.50

DISBURSEMENT FOR:

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Council, Baradel, Koumerl & Nolan
P. O. Box 2290
Annapolis, MC 21404-2289

PURPOSE OF DISBURSEMENT

Legal Services

5/1/95

3,689.97

DISBURSEMENT FOR:

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

William T. Gowan
110 Broadway, Suite 209
San Antonio, Texas 78205

PURPOSE OF DISBURSEMENT

Travel Expense

4/5/95

2,417.55

DISBURSEMENT FOR:

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Hughes & Luce
1717 Main Street, Suite 2800
Dallas, Texas 75201

PURPOSE OF DISBURSEMENT

Legal Services

5/1/95

75,694.74

DISBURSEMENT FOR:

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Frederick Kohler
Box 5956
Scottsdale, AZ 85261

PURPOSE OF DISBURSEMENT

Office relocation expense

5/1/95

200.00

DISBURSEMENT FOR:

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Kohn, Shands, Elbert,
Gianoulakis & Giljum
One Mercantile Ctr, 24th Floor
St. Louis, MO 63101-1643

PURPOSE OF DISBURSEMENT

Legal Services

5/1/95

9,839.06

DISBURSEMENT FOR:

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Meltzer, Lippe
The Chancery
Mineola, NY 11501

PURPOSE OF DISBURSEMENT

Legal Services

5/1/95

3,703.59

DISBURSEMENT FOR:

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Nousaman/Cuthner/Knox/Elliott
Union Bank Sq, 31st Floor
445 South Figueroa Street
Los Angeles, CA 90071-1602

PURPOSE OF DISBURSEMENT

Legal Services

5/1/95

8,135.95

DISBURSEMENT FOR:

Other (specify)

☐ Primary ☒ General ☐

SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)

108,883.36

TOTAL THIS PERIOD (last page this line number only)

108,883.36

9804300631210

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

Perot '92

7616 LBJ Freeway, Suite 727, Dallas, Texas 75251
Telephone (214) 450-8800

FEB 3 8 52 AM '96

Mike Poss
Treasurer

Direct Dial Number
(214) 788-3030

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

January 30, 1996

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

Re: Perot '92/ID No. C00263145

Ladies and Gentlemen:

Enclosed please find the termination report for Perot '92 (ID No. C00263145).

Please file stamp the enclosed additional copy of this letter with attachments and return it to me in the enclosed envelope.

Very truly yours,

Mike Poss

Mike Poss
Treasurer

JMP/lb
Enclosures

EXHIBIT

B

9 8 0 4 3 8 6 3 1 2 2

**REPORT OF RECEIPTS AND DISBURSEMENTS
BY AN AUTHORIZED COMMITTEE OF A CANDIDATE
FOR THE OFFICE OF PRESIDENT OR VICE PRESIDENT**

USE PEC MAILING LABEL OR TYPE OR PRINT	1. NAME OR COMMITTEE (in full) Perot '92	FEB 3 8 52 AM '96
	ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1700 Lakeside Square, 12377 Merit Drive	2. IDENTIFICATION NUMBER C00263145
	CITY, STATE, and ZIP CODE Dallas, Texas 75251	3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General

4. TYPE OF REPORT (Check here <input checked="" type="checkbox"/> if this is a Termination Report) (a) "X" appropriate box and complete, if applicable <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input checked="" type="checkbox"/> January 31 Year End Report	Monthly Report Due on <input type="checkbox"/> February 28 <input type="checkbox"/> June 30 <input type="checkbox"/> October 30 <input type="checkbox"/> March 30 <input type="checkbox"/> July 30 <input type="checkbox"/> November 30 <input type="checkbox"/> April 30 <input type="checkbox"/> August 30 <input type="checkbox"/> December 30 <input type="checkbox"/> May 30 <input type="checkbox"/> September 30 <input type="checkbox"/> January 31 <input type="checkbox"/> Twelfth day report preceding <u>Presidential</u> election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on <u>11-3-92</u>
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(b) Is this Report an Amendment? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	5. COVERING PERIOD FROM <u>October 1, 1995</u> THROUGH <u>December 31, 1995</u>
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SUMMARY	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 2px;">6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD</td> <td style="width: 30%; padding: 2px; text-align: right;">1,008,204.70</td> </tr> <tr> <td style="padding: 2px;">7. TOTAL RECEIPTS THIS PERIOD (From Line 22, Column A, Page 2)</td> <td style="padding: 2px; text-align: right;">1,065,246.90</td> </tr> <tr> <td style="padding: 2px;">8. SUBTOTAL (Lines 6 and 7)</td> <td style="padding: 2px; text-align: right;">2,073,451.60</td> </tr> <tr> <td style="padding: 2px;">9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30, Column A, Page 2)</td> <td style="padding: 2px; text-align: right;">2,073,451.60</td> </tr> <tr> <td style="padding: 2px;">10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)</td> <td style="padding: 2px; text-align: right;">-0-</td> </tr> <tr> <td style="padding: 2px;">11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Remittees All on Schedule C-P or Schedule D-P)</td> <td style="padding: 2px; text-align: right;">-0-</td> </tr> <tr> <td style="padding: 2px;">12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Remittees All on Schedule C-P or Schedule D-P)</td> <td style="padding: 2px; text-align: right;">-0-</td> </tr> <tr> <td style="padding: 2px;">13. EXPENDITURES SUBJECT TO LIMITATION</td> <td style="padding: 2px;"></td> </tr> </table>	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	1,008,204.70	7. TOTAL RECEIPTS THIS PERIOD (From Line 22, Column A, Page 2)	1,065,246.90	8. SUBTOTAL (Lines 6 and 7)	2,073,451.60	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30, Column A, Page 2)	2,073,451.60	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)	-0-	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Remittees All on Schedule C-P or Schedule D-P)	-0-	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Remittees All on Schedule C-P or Schedule D-P)	-0-	13. EXPENDITURES SUBJECT TO LIMITATION	
6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	1,008,204.70																
7. TOTAL RECEIPTS THIS PERIOD (From Line 22, Column A, Page 2)	1,065,246.90																
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11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Remittees All on Schedule C-P or Schedule D-P)	-0-																
12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Remittees All on Schedule C-P or Schedule D-P)	-0-																
13. EXPENDITURES SUBJECT TO LIMITATION																	
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 2px;">14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d, Column B from 17a, Column B, Page 2)</td> <td style="width: 30%; padding: 2px; text-align: right;">1,285,981.43</td> </tr> <tr> <td style="padding: 2px;">15. NET OPERATING EXPENDITURES (Subtract Line 28a, Column B from 23, Column B, Page 2)</td> <td style="padding: 2px; text-align: right;">329,536.14</td> </tr> </table>	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d, Column B from 17a, Column B, Page 2)	1,285,981.43	15. NET OPERATING EXPENDITURES (Subtract Line 28a, Column B from 23, Column B, Page 2)	329,536.14												
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15. NET OPERATING EXPENDITURES (Subtract Line 28a, Column B from 23, Column B, Page 2)	329,536.14																

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.	TYPE OR PRINT NAME OF TREASURER SIGNATURE OF TREASURER 	DATE 1-31-96
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NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g.

All previous versions of PEC FORM 3P are obsolete and should no longer be used.

For further information, contact:
 Federal Election Commission
 940 E Street, N.W.
 Washington, D.C. 20543
 Toll Free 800-426-6820
 Local 202-418-6420
 PEC FORM 3P, Page 1 (5/95)

98043863123

I hereby certify that this document is a complete and accurate copy of the original document on file with the Federal Election Commission.

4/30/97
 Michael G. Dickerson
 Esq., P.A. & Notary

"This is not the complete report but contains the information requested."

DETAILS SUMMARY OF RECEIPTS AND DISBURSEMENTS
(Page 2, FEC FORM 3P)

NAME OF COMMITTEE, or Full Name of Candidate
Perot '92 C00263145

REPORT COVERING THE PERIOD
From 10/1/95 Through 12/31/95

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS			
1. FEDERAL FUNDS (Itemize on Schedule A-P)			16
2. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			17(a)
(b) Political Party Committees			17(b)
(c) Other Political Committees			17(c)
(d) The Candidate	1,065,246.90	1,285,981.43	17(d)
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d))	1,065,246.90	1,285,981.43	17(e)
3. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			18
4. LOANS RECEIVED			
(a) Loans Received From or Guaranteed by Candidate			19(a)
(b) Other Loans			19(b)
(c) TOTAL LOANS (Add 19(a) and 19(b))			19(c)
20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):			
(a) Operating		18,067.75	20(a)
(b) Fundraising			20(b)
(c) Legal and Accounting			20(c)
(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c))			20(d)
21. OTHER RECEIPTS (Dividends, interest, etc.)			21
22. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21)	1,065,246.90	1,304,049.18	22
II. DISBURSEMENTS			
23. OPERATING EXPENDITURES	135,044.53	347,603.89	23
24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			24
25. FUNDRAISING DISBURSEMENTS			25
26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS			26
27. LOAN REPAYMENTS MADE:			
(a) Repayments of Loans made or Guaranteed by Candidate	1,938,407.07	1,938,407.07	27(a)
(b) Other Repayments			27(b)
(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b))	1,938,407.07	1,938,407.07	27(c)
28. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons (Other Than Political) Committees			28(a)
(b) Political Party Committees			28(b)
(c) Other Political Committees			28(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c))			28(d)
29. OTHER DISBURSEMENTS			29
30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29)	2,073,451.60	2,286,011.96	30
III. CONTRIBUTED ITEMS (Stock, Art Objects, Etc.)			
31. ITEMS ON HAND TO BE LIQUIDATED (Attach List)			31

DISBURSEMENTS

Use this space to enter each category of the detailed summary page

1

2 (total pages)

2

LINE NUMBER

23

NAME OF COMMITTEE (if 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.

DATE
(MONTH,
DAY,
YEAR)

AMOUNT OF
EACH
DISBURSEMENT
THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE

New Jersey Employment Agency
CN 396
Trenton, NJ 08625

PURPOSE OF DISBURSEMENT

Employment taxes

10/25/95

10.37

DISBURSEMENT FOR

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Armstrong, Teasdale, Schlafly
and Davis
One Metropolitan Square, #2600
St. Louis, MO 63102-2740

PURPOSE OF DISBURSEMENT

Legal Services

10/27/95

1,420.10

DISBURSEMENT FOR

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Council, Baradel, Kosmerl &
Nolan, PA
P.O. Box 2289
Annapolis, MD 21404-2289

PURPOSE OF DISBURSEMENT

Legal Services

10/27/95

7,193.33

DISBURSEMENT FOR

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Kohn, Shands, Elbert
Gianoulakis & Giljam
One Mercantile Center, 24th flr.
St. Louis, MO 63101-1643

PURPOSE OF DISBURSEMENT

Legal Services

10/27/95

529.86

DISBURSEMENT FOR

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Meltzer, Lippe, ET AL
The Chancery
190 Willis Avenue
Mineola, NY 11501

PURPOSE OF DISBURSEMENT

Legal Services

10/27/95

105.00

DISBURSEMENT FOR

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Nossaman, Guehner, Knox, Elliott
Union Bank Square, 31st Floor
445 South Figueroa St.
Los Angeles, CA 90071-1602

PURPOSE OF DISBURSEMENT

Legal Services

10/27/95

13,107.21

DISBURSEMENT FOR

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Skadden, Arps, Slate, Meagher
and Flom
919 Third Avenue
New York, NY 10022-3997

PURPOSE OF DISBURSEMENT

Legal Services

12/7/95

5,686.00

DISBURSEMENT FOR

Other (specify)

☐ Primary ☒ General ☐

NAME, ADDRESS, CITY, STATE, ZIP CODE

Armstrong, Teasdale, Schlafly
and Davis
One Metropolitan Square #2600
St. Louis, MO 63102-2740

PURPOSE OF DISBURSEMENT

Legal Services

12/28/95

435.50

DISBURSEMENT FOR

Other (specify)

☐ Primary ☒ General ☐

SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)

28,487.37

TOTAL THIS PERIOD (last page has line number only)

28,487.37

FED-0047

9 8 2 0 4 5 3 3 0 6 3 1 2 3 1

Perot '92
7616 LBJ Freeway, Suite 727, Dallas, Texas 75251
Telephone (214) 450-8800

RECEIVED
FEDERAL ELECTION
COMMISSION
MAR 1 1996

FEB 3 8 52 AM '96

Mike Poss
Treasurer

Direct Dial Number
(214) 788-3030

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

January 30, 1996

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

Re: Perot '92/ID No. C00263145

Ladies and Gentlemen:

Enclosed please find the termination report for Perot '92 (ID No. C00263145).

Please file stamp the enclosed additional copy of this letter with attachments and return it to me in the enclosed envelope.

Very truly yours,

Mike Poss

Mike Poss
Treasurer

JMP/tb
Enclosures

EXHIBIT

C

**REPORT OF RECEIPTS AND DISBURSEMENTS
BY AN AUTHORIZED COMMITTEE OF A CANDIDATE
FOR THE OFFICE OF PRESIDENT OR VICE PRESIDENT**

USE FOR MAILING LABEL OR TYPE OR PRINT	1. NAME OF CANDIDATE (in full) Perot '92		FEB 3 8 32 AM '92	
	2. ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1700 Lakeside Square, 12377 Merit Drive		3. IDENTIFICATION NUMBER C00263145	
	4. CITY, STATE, and ZIP CODE Dallas, Texas 75251		5. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	
6. TYPE OF REPORT (Check here <input checked="" type="checkbox"/> if this is a Termination Report.) (a) "X" appropriate box and complete, if applicable				
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input checked="" type="checkbox"/> January 31 Year End Report </div> <div style="width: 50%;"> Monthly Report Due on <input type="checkbox"/> February 20 <input type="checkbox"/> June 20 <input type="checkbox"/> October 20 <input type="checkbox"/> March 20 <input type="checkbox"/> July 20 <input type="checkbox"/> November 20 <input type="checkbox"/> April 20 <input type="checkbox"/> August 20 <input type="checkbox"/> December 20 <input type="checkbox"/> May 20 <input type="checkbox"/> September 20 <input type="checkbox"/> January 31 <input type="checkbox"/> Twelfth day report preceding <u>Presidential</u> election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on <u>11-3-92</u> </div> </div>				
(b) Is this Report an Amendment? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
7. COVERING PERIOD				
FROM October 1, 1995 THROUGH December 31, 1995				
8. SUMMARY				
9. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD			1,008,204.70	
10. TOTAL RECEIPTS THIS PERIOD (From Line 22, Column A, Page 2)			1,065,246.90	
11. SUBTOTAL (Lines 9 and 10)			2,073,451.60	
12. TOTAL DISBURSEMENTS THIS PERIOD (From Line 38, Column A, Page 2)			2,073,451.60	
13. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 12 from 11)			-0-	
14. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Remittees All on Schedule C-P or Schedule D-P)			-0-	
15. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Remittees All on Schedule C-P or Schedule D-P)			-0-	
16. EXPENDITURES SUBJECT TO LIMITATION				
17. NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES				
18. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 26d, Column B from 17a, Column B, Page 2)			1,285,981.43	
19. NET OPERATING EXPENDITURES (Subtract Line 26a, Column B from 22, Column B, Page 2)			329,536.14	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.				
TYPE OR PRINT NAME OF TREASURER SIGNATURE OF TREASURER <i>Mike Perot</i> DATE 1-31-96				
NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g. All previous versions of FSC FORM 3P are obsolete and should no longer be used.				
For further information, contact: Federal Election Commission 970 E Street, N.W. Washington, D.C. 20543 Toll Free 800-424-9589 Local 202-310-6480 FSC FORM 3P, Page 1 (5/95)				

I hereby certify that this document is a complete and accurate copy of the original document on file with the Federal Election Commission.

Michael G. Dickinson
 Michael G. Dickinson
 Clerk, Public Records

"This is not the complete report but contains the information requested."

DETAILED SUMMARY OF RECEIPTS AND DISBURSEMENTS
(Page 2, FEC FORM 3P)

NAME OF COMMITTEE OR FUND
FEC# 92 C00263145

REPORT COVERING THE PERIOD
From 10/1/95 Through 12/31/95

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS			
1. FEDERAL FUNDS (Itemize on Schedule A-P)			16
2. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			17(a)
(b) Political Party Committees			17(b)
(c) Other Political Committees			17(c)
(d) The Candidate	1,065,246.90	1,285,981.43	17(d)
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d))	1,065,246.90	1,285,981.43	17(e)
3. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			18
4. LOANS RECEIVED			
(a) Loans Received From or Guaranteed by Candidate			19(a)
(b) Other Loans			19(b)
(c) TOTAL LOANS (Add 19(a) and 19(b))			19(c)
20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):			
(a) Operating		18,067.75	20(a)
(b) Fundraising			20(b)
(c) Legal and Accounting			20(c)
(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c))			20(d)
21. OTHER RECEIPTS (Dividends, interest, etc.)			21
22. TOTAL RECEIPTS (Add 17(e), 18, 19(c), 20(d) and 21)	1,065,246.90	1,304,049.18	22
II. DISBURSEMENTS			
23. OPERATING EXPENDITURES	135,044.53	347,603.89	23
24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			24
25. FUNDRAISING DISBURSEMENTS			25
26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS			26
27. LOAN REPAYMENTS MADE:			
(a) Repayments of Loans made or Guaranteed by Candidate	1,938,407.07	1,938,407.07	27(a)
(b) Other Repayments			27(b)
(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b))	1,938,407.07	1,938,407.07	27(c)
28. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			28(a)
(b) Political Party Committees			28(b)
(c) Other Political Committees			28(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c))			28(d)
29. OTHER DISBURSEMENTS			29
30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29)	2,073,451.60	2,286,010.96	30
III. CONTRIBUTED ITEMS (Stock, Art Objects, Etc.)			
31. ITEMS ON HAND TO BE LIQUIDATED (Attach List)			31

ITEMIZED DISBURSEMENTS

Use separate sheet for each of the detailed summary page	2	Of total pages 2
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.		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NAME, ADDRESS, CITY, STATE, ZIP CODE Council, Baradel, Kosmerl and Nolan, PA P.O. Box 2289 Annapolis, MD 21404-2289	PURPOSE OF DISBURSEMENT Legal Services DISBURSEMENT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/28/95	601.27
NAME, ADDRESS, CITY, STATE, ZIP CODE Hughes & Luce, LLP 1717 Main Street, #2800 Dallas, TX 75201	PURPOSE OF DISBURSEMENT Legal Services DISBURSEMENT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/28/95	105,467.15
NAME, ADDRESS, CITY, STATE, ZIP CODE Kohn, Shands, Elbert Gianoulakis & Giljam One Mercantile Ctr., 24th Floor St. Louis, MO 63101-1643	PURPOSE OF DISBURSEMENT Legal Services DISBURSEMENT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/28/95	299.74
NAME, ADDRESS, CITY, STATE, ZIP CODE Meltzer, Lippe, ET AL The Chancery 190 Willis Avenue Mineola, NY 11501	PURPOSE OF DISBURSEMENT Legal Services DISBURSEMENT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/28/95	84.00
NAME, ADDRESS, CITY, STATE, ZIP CODE Nossaman, Guthner, Knox, Elliott Union Bank Square, 31st Floor 445 South- Figueroa St. Los Angeles, CA 90071-1602	PURPOSE OF DISBURSEMENT Legal Services DISBURSEMENT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/28/95	105.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			106,557.16
TOTAL THIS PERIOD (last page this line number only)			135,044.53

SCHEDULE A-P

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

ITEMIZED RECEIPTS

Contributions from the Candidate

Use separate
schedules for
each category
of the detailed
summary page

PAGE

OF total pages

LINE NUMBER

NAME OF COMMITTEE (in Full)

Perot '92 C00263145

17 (d)

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DATE
(MONTH,
DAY,
YEAR)

AMOUNT OF
EACH RECEIPT
THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE

H. Ross Perot
12377 Merit Drive, Suite 1700
Dallas, Texas 75251

NAME OF EMPLOYER

Self

OCCUPATION

Businessman

AGGREGATE YEAR-TO-DATE

\$220,734.53

RECEIPT FOR

☐ Primary

☒ General

5/1/95

\$155,734.53

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

☐ Primary

☐ General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

☐ Primary

☐ General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

☐ Primary

☐ General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

☐ Primary

☐ General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

☐ Primary

☐ General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

☐ Primary

☐ General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

☐ Primary

☐ General

SUBTOTAL OF RECEIPTS THIS PAGE (optional)

\$155,734.53

TOTAL THIS PERIOD (last page this line number only)

\$155,734.53

EXHIBIT

D

9800433681300

ITEMIZED RECEIPTS

Contributions from the Candidate

Use separate schedules for each category of the detailed summary page

Page 1

of total pages 1

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 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.

DATE
(MONTH,
DAY,
YEAR)

AMOUNT OF
EACH RECEIPT
THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE

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

NAME OF EMPLOYER

Self

OCCUPATION
Businessman

RECEIPT FOR

☐ Primary

☒ General

AGGREGATE YEAR-TO-DATE
261,672.25

12/22/95

40,937.72

NAME, ADDRESS, CITY, STATE, ZIP CODE

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

NAME OF EMPLOYER

Self

OCCUPATION
Businessman

RECEIPT FOR

☐ Primary

☒ General

AGGREGATE YEAR-TO-DATE

12/31/95

1,024,309.18

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

RECEIPT FOR

☐ Primary

☐ General

AGGREGATE YEAR-TO-DATE

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

RECEIPT FOR

☐ Primary

☐ General

AGGREGATE YEAR-TO-DATE

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

RECEIPT FOR

☐ Primary

☐ General

AGGREGATE YEAR-TO-DATE

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

RECEIPT FOR

☐ Primary

☐ General

AGGREGATE YEAR-TO-DATE

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

RECEIPT FOR

☐ Primary

☐ General

AGGREGATE YEAR-TO-DATE

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

RECEIPT FOR

☐ Primary

☐ General

AGGREGATE YEAR-TO-DATE

EXHIBIT

E

SUBTOTAL OF RECEIPTS THIS PAGE

1,065,246.90

TOTAL THIS PERIOD (last page this line number only)

1,065,246.90

98043863131
95330253910

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF MISSOURI
3 MARK DOTILEA, KEVIN
4 LAUGHLIN, EDWARD DYCH,
5 AND CHARLIE ALSPAN,
6 Plaintiffs,
7 VS.
8 THE PEROT PETITION
9 COMMITTEE, EQUIFAX
10 CREDIT INFORMATION
11 SERVICES, INC., ROSS
12 MELAYE, AND SANDRA
13 STONE MCCLURE,
14 Defendants.

15 CONSOLIDATED
16 CIVIL ACTION NO.
17 4:94CV887 GFC

18 IN THE UNITED STATES DISTRICT COURT
19 FOR THE NORTHERN DISTRICT OF TEXAS
20 DALLAS DIVISION
21 KEVIN LAUGHLIN, EDWARD
22 DYCH, CHARLIE ALSPAN,
23 AND MARK DOTILEA,
24 Plaintiffs,
25 VS.
26 ROSS PEROT, MARK ALAN
27 BLANKIN AND THE CALLAHAN
28 & GIBBONS GROUP, INC.,
29 Defendants.

30 CONSOLIDATED
31 CIVIL ACTION NO.
32 3-93-CV-2377-R

33 ORAL DEPOSITION OF
34 J. MICHAEL POSS

35 ANSWERS AND DEPOSITION OF J. MICHAEL POSS, a
36 witness produced on behalf of the Plaintiff, taken
37 in the above styled and numbered cause at 9:46

Page 1

1 A.M. on 29th day of May, 1996, before me.
2 Michael Poss, a Certified Shorthand Reporter in
3 and for the State of Texas, at the Law Office of
4 Hughes & Luce, L.L.P., 1717 Main Street, Suite
5 2800, located in the City of Dallas, County of
6 Dallas, State of Texas, pursuant to Amended Notice
7 of Deposition and in accordance with the
8 stipulation hereinafter set forth.

Page 2

APPEARANCES

MR. F. JOHN REEKS
Bodenheimer, Jones, Riets & Simmons
509 Milan Street
Shreveport, Louisiana 71101
APPEARING FOR THE PLAINTIFFS, KEVIN
LAUGHLIN, EDWARD DYCH AND CHARLIE ALSPAN

MR. MARK DOTILEA
2222 Menard
St. Louis, Missouri 73104
APPEARING AS PLAINTIFF PRO SE

MS. KIM JUANITA ASKEW and
MR. CRAIG W. BUDNER
Hughes & Luce, L.L.P.
1717 Main Street, Suite 2800
Dallas, Texas 75201
APPEARING FOR THE DEFENDANTS, THE PEROT
PETITION COMMITTEE, ROSS PEROT, ROSS
MELAYE AND MARK ALAN BLANKIN

1 (APPEARANCES CONTINUED)
2 MR. G. CARROLL STRIBLING, JR.
3 Elzerher & Becker, P.C.
4 231 South Main Street, Eighth Floor
5 St. Louis, (Clayton), Missouri 63105
6 APPEARING FOR THE DEFENDANT, EQUIFAX
7 CREDIT INFORMATION SERVICES, INC.

8 ALSO PRESENT: Edward Dych
9 Kevin Laughlin
10

EXAMINATION INDEX

EXAMINATION	PAGE
BY MR. REEKS	1
BY MR. STRIBLING	11
BY MR. DOTILEA	12
BY MR. ASKEW	13

FURTHER EXAMINATION

BY MR. STRIBLING	120
BY MR. DOTILEA	121
BY MR. REEKS	122
BY MR. ASKEW	123
BY MR. DOTILEA	124
BY MR. REEKS	125
BY MR. ASKEW	126

EXHIBIT INDEX

EXHIBITION	PAGE
NO. 60 Affidavit of Mike Poss	54
NO. 61 Document labeled "Statement of Organization"	54

Page 3

(EXHIBIT INDEX CONTINUED)

EXHIBITION	PAGE
NO. 62 4-7-92 Memorandum, Perot Petition Committee to State Coordinators on Campaign Finance Procedures	58
NO. 63 Signature Authorization for Unincorporated Not for Profit Organizations	61
NO. 64 Marked but not unidentified material provided for attachment	64
NO. 65 4-27-92 Memorandum, John Richards to All District Coordinators on Congressional District Transfers and Bank Accounts	66
NO. 66 3-20-92 Letter, Ross Perot to Federal Election Commission	64
NO. 67 Declaration of Candidacy for President of the United States	68
NO. 68 Document labeled "Event Declaration"	10
NO. 69 Pocket of documents labeled "Schedule B, Itemized Expenditures"	21
NO. 70 11-29-93 Letter, Edward Dych to The Perot Group (Perot)	101
NO. 71 12-11-93 Letter, Perot "SE" (Perot) to Edward Dych	101
NO. 72 12-11-93 Letter, Mark Dotiler to The Perot Group (Perot)	120
NO. 73 12-20-93 Letter, Perot "SE" (Perot) to Mark Dotiler	120

Page 4

EXHIBIT

F

COPY

Page 5

Page 6

1 J. MICHAEL POSS.
 2 the witness hereinbefore named, being first duly
 3 cautioned and sworn to testify the truth, the
 4 whole truth and nothing but the truth, testified
 5 on his oath as follows:
 6 THE REPORTER: Would you state your
 7 stipulation, please.
 8 MR. REEKS: Okay. This deposition
 9 is taken pursuant to the Federal Rules. Mr. Poss,
 10 would you --
 11 MS. ASKEW: And we're taking it in
 12 both cases, the Missouri and the Dallas
 13 litigation.
 14 MR. REEKS: Right. In both cases.
 15 EXAMINATION
 16 BY MR. REEKS:
 17 Q. Mr. Poss, would you please state your
 18 full name and address.
 19 A. James Michael Poss, 6405 Mercedes
 20 Avenue, Dallas, Texas, 75214.
 21 Q. Okay. And, Mr. Poss, you've had your
 22 deposition taken before?
 23 A. Yes, I have.
 24 Q. Okay. And I'm going to be asking you
 25 some questions today about your knowledge of

1 events that occurred during the 1992 presidential
 2 campaign and the petition effort for Mr. Perot.
 3 If I ask you any questions that you're not
 4 clear about or don't understand, please stop me
 5 and ask me to go back and reask the question. Is
 6 that agreeable?
 7 A. Yes, it is.
 8 Q. And if you answer a question, we'll
 9 understand that you understood the question. Is
 10 that agreeable?
 11 A. Yes, it is.
 12 Q. Prior to coming here today, did you
 13 discuss your deposition with anyone?
 14 A. Yes, I did.
 15 Q. Okay. With whom?
 16 A. With Ms. Askew and with Craig Budner.
 17 Q. Okay. No one else?
 18 A. No one else.
 19 Q. Have you discussed the depositions of
 20 any of the other parties or witnesses that have
 21 been taken in this case?
 22 A. No, I have not.
 23 Q. Have you read any of the prior
 24 depositions that have been taken in this case?
 25 A. No, I have not.

Page 7

Page 8

1 Q. The Court Reporter reminded me that
 2 we've been forgetting to ask in these depositions
 3 about reading and signing the deposition. And for
 4 the record, would you like to read and sign the
 5 deposition after it's been transcribed by the
 6 Court Reporter?
 7 MS. ASKEW: Yes.
 8 THE WITNESS: Yes, I would.
 9 MS. ASKEW: And I would agree to
 10 signature before any notary.
 11 MR. REEKS: Okay.
 12 MS. ASKEW: And that will apply,
 13 just so the record is clear, as to all witnesses
 14 that you have deposed that we have presented for
 15 deposition -- Russ Monroe, Russ Melbye, Joe Grant,
 16 Mark Blahnik.
 17 MR. REEKS: That's agreeable.
 18 Thank you, Ms. Askew.
 19 Q. Mr. Poss, just by way of background, let
 20 me get some information about your education. Did
 21 you go to college?
 22 A. Yes, I did.
 23 Q. Okay. And where did you go to college?
 24 A. The University of Texas at Austin.
 25 Q. Okay. And what course of study did you

1 engage in at the University of Texas?
 2 A. Accounting.
 3 Q. And did you receive a degree in
 4 accounting?
 5 A. I did.
 6 Q. And it was a B.A.?
 7 A. B.B.A.
 8 Q. B.B.A.? Okay. And when was that?
 9 A. 1973.
 10 Q. And did you do any postgraduate work?
 11 A. I did.
 12 Q. Okay. And where was that?
 13 A. That was at the University of Texas at
 14 Austin.
 15 Q. And what was that in?
 16 A. That was in law.
 17 Q. Went to law school?
 18 A. I did.
 19 Q. And did you get a juris doctor?
 20 A. I did.
 21 Q. And when was your juris doctor awarded?
 22 A. 1976.
 23 Q. Have you been engaged in the practice of
 24 law since getting out of law school?
 25 A. No, I have not.

1 as treasurer, in this March through June 1992
2 period, did you ever go to the state of Missouri
3 for any purpose?

4 A. No, I did not.

5 Q. Did The Perot Petition Committee ever
6 open an office in the state of Missouri?

7 A. No.

8 Q. Did The Perot Petition Committee ever
9 operate in the state of Missouri?

10 A. No.

11 Q. Did The Perot Petition Committee ever
12 hire any volunteers from the state of Missouri as
13 parts of its staff during the period from March
14 through June of 1992?

15 A. No.

16 Q. Did The Perot Petition Committee ever
17 hire Sandra McClure, Kevin Laughlin, Edward Dyck,
18 Carrie Alspaw or Mark Dotzler for any purpose
19 during this period, March through June 1992?

20 A. No.

21 Q. Were any of these persons, during the
22 period, March through June 1992 -- and I'll
23 mention them again. McClure, Laughlin, Dyck,
24 Alspaw or Dotzler -- ever authorized to act on
25 behalf of The Perot Petition Committee?

1 A. No.

2 Q. Did The Perot Petition Committee
3 establish Missouri for Perot?

4 A. No.

5 Q. Did you, as the treasurer of The Perot
6 Petition Committee in Dallas, ever establish
7 Missouri for Perot? Did you have any role in
8 that?

9 A. No.

10 Q. Did you or other members of the Perot
11 Petition Committee staff, to your knowledge, ever
12 manage or operate any aspect of Missouri for
13 Perot?

14 A. No.

15 Q. Did The Perot Petition Committee have
16 any role in selecting the volunteers who may have
17 participated in the activities of Missouri for
18 Perot?

19 A. No.

20 Q. There has been some discussion of the
21 organizational structure of Missouri for Perot.
22 And I'll ask you to look again at a document that
23 Mr. Reeks previously showed you, which was marked
24 as Melbye Exhibit No. 1. Did you have any role in
25 setting up the organizational structure for

1 Missouri for Perot?

2 A. No.

3 Q. Did you or any person under your
4 direction ever assist Missouri for Perot in
5 setting up their organizational structure?

6 A. No.

7 Q. Did you or any persons acting under your
8 control ever give any advice or supervision to
9 Missouri for Perot on what their organizational
10 structure would be and how it would be run?

11 A. No.

12 Q. Were you ever a part of the steering
13 committee of Missouri for Perot?

14 A. No.

15 Q. Did you handle any aspect of the
16 Missouri for Perot petition drive?

17 A. No.

18 Q. Did you or other personnel at The Perot
19 Petition Committee ever assist Missouri for Perot
20 in organizing their petition drive?

21 A. No.

22 Q. Did The Perot Petition Committee assist
23 them in conducting the petition drive?

24 A. No.

25 Q. How about in selecting their office

1 space and the other types of administrative things
2 that we've discussed? Telephones, that type of
3 thing?

4 A. No.

5 Q. Do you know when Missouri for Perot came
6 into existence?

7 A. I do not.

8 Q. Do you know who organized Missouri for
9 Perot?

10 A. No, I don't.

11 Q. Do you know when Missouri for Perot, how
12 it came into existence?

13 A. No.

14 Q. Now, there has been some discussion of
15 state organizations becoming affiliated
16 organizations of The Perot Petition Committee.

17 Would you explain what, to your knowledge, as
18 treasurer of The Perot Petition Committee, what
19 happened when The Perot Petition Committee had an
20 affiliate relationship with a state organization.

21 A. That was for FEC purposes only. And it
22 enabled the reporting of the state operations to
23 be consolidated in the report of the primary
24 candidate committee for purposes of monthly
25 reporting to the FEC.

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1 Q. Now, apart from the reporting
2 requirements, was there any other change in the
3 relationship between a state organization like
4 Missouri for Perot, for example, and The Perot
5 Petition Committee?
6 A. No.
7 Q. If a state organization was an
8 affiliate, would The Perot Petition Committee in
9 any way become involved in their daily
10 operations?
11 A. No.
12 Q. Let me ask you this. Could The Perot
13 Petition Committee in any way force a state
14 volunteer organization to become an affiliate
15 organization?
16 A. No.
17 Q. Is there anything you could do to force
18 a state to handle its reporting requirements
19 through The Perot Petition Committee?
20 A. No.
21 Q. After a state organization became an
22 affiliated organization, did The Perot Petition
23 Committee become involved in any way in any of the
24 local volunteer issues?
25 A. No.

1 Q. After there was an affiliated
2 relationship, did The Perot Petition Committee
3 participate in any way in the hiring, firing or
4 selection of volunteers?
5 A. No.
6 Q. Did The Perot Petition Committee ever
7 decide which volunteers on a state level were
8 appropriate for particular jobs in the volunteer
9 organization?
10 A. No.
11 Q. After an organization became an
12 affiliate organization, did The Perot Petition
13 Committee in any way approve particular
14 volunteers?
15 A. No.
16 Q. Did The Perot Petition Committee have
17 any role in the overall handling of the office
18 administration of the states?
19 A. No.
20 Q. Did it exercise any type of control over
21 the day-to-day operations of the state volunteer
22 groups that became affiliate organizations for
23 reporting purposes?
24 A. No.
25 Q. Did you ever personally speak with the

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1 Plaintiff, Mark Dotzler?
2 A. No.
3 Q. Did you ever give him any kind of
4 instructions on how he was to undertake any action
5 on behalf of Missouri for Perot?
6 A. No.
7 Q. Did you ever speak with Plaintiff Carrie
8 Alspaw in this lawsuit?
9 A. No.
10 Q. Did you ever speak with the Plaintiff,
11 Edward Dyck, to give any instructions as to how he
12 was to operate Missouri for Perot?
13 A. No.
14 Q. Did you ever talk with Kevin Laughlin
15 and give him any instructions as to how Missouri
16 for Perot was to be operated?
17 A. I may have talked with Mr. Laughlin.
18 Q. Okay. Do you recall what you may have
19 spoken to him about?
20 A. No, I do not.
21 Q. If you had spoken to Mr. Laughlin, would
22 you have been giving him instructions on how to
23 run the local Missouri organization?
24 A. No.
25 Q. Why not?

1 MR. REEKS: Object. Calls for
2 speculation.
3 MS. ASKEW: He can tell why he
4 wouldn't have done it. He's the only person who
5 would know.
6 Q. You can answer the question.
7 A. I didn't -- I didn't exercise any
8 control over the Missouri operation.
9 Q. Was Mr. Laughlin ever an employee of
10 Missouri for Perot?
11 A. No.
12 Q. Did you ever offer Mr. Laughlin a job in
13 Missouri for Perot?
14 A. No.
15 Q. How about Ms. McClure? Did you ever
16 hire Ms. McClure as part of The Perot Petition
17 Committee?
18 A. No.
19 MR. STRIBLING: Excuse me. Did you
20 misspeak in your earlier question, saying, did he
21 ever hire in for Missouri for Perot?
22 MS. ASKEW: No. Did he ever hire
23 McClure as part of The Perot Petition Committee.
24 MR. STRIBLING: You said Missouri
25 for Perot.

1 MS. ASKEW: Thank you.
 2 Q. Did you ever hire, as part of The Perot
 3 Petition Committee, Ms. McClure, Sandra McClure?
 4 A. No.
 5 Q. Did she ever report to you?
 6 A. No.
 7 Q. Did Ms. McClure ever talk to you about
 8 any of the Plaintiffs to this lawsuit?
 9 A. No.
 10 Q. During this period, March through June
 11 of 1992, did Ms. McClure talk to you about
 12 anything as it related to the state of Missouri?
 13 A. No. During this period, March through
 14 June of 1992, did you ever hear any discussion
 15 whatsoever in The Perot Petition Committee as it
 16 related to Plaintiffs Laughlin, Dotzler, Dyck and
 17 Laughlin (sic)?
 18 A. No.
 19 Q. Didn't talk about them with Mr. Luce or
 20 Mr. Mulford?
 21 A. No.
 22 Q. Now, in response to one of Mr. Reeks'
 23 earlier questions, you indicated that there were
 24 certain persons who performed services on behalf
 25 of The Perot Petition Committee who were actually

1 on the payroll of The Perot Group; is that
 2 correct?
 3 A. That's correct.
 4 Q. Was there a particular manner in which
 5 the salary of those people was handled for FEC
 6 reporting purposes?
 7 A. Yes, there was.
 8 Q. Would you tell the jury how that was
 9 handled for FEC reporting purposes.
 10 A. That was reported as an in-kind
 11 contribution by Ross Perot to The Perot Petition
 12 Committee.
 13 Q. And who actually did the FEC work
 14 showing that this was an in-kind contribution?
 15 A. I'm sorry. I don't understand.
 16 Q. Can you tell who would have prepared the
 17 information showing that those were in-kind
 18 contributions?
 19 A. I prepared that.
 20 Q. There has been discussion of credit
 21 reports. To your knowledge, are you aware of The
 22 Perot Petition Committee ever receiving any credit
 23 reports on any volunteer?
 24 A. No.
 25 Q. As treasurer for The Perot Petition

1 Committee, did you ever request that anyone obtain
 2 credit reports on any volunteer?
 3 A. No.
 4 Q. Did you ever request that credit reports
 5 be obtained on any of the Plaintiffs to this
 6 lawsuit? Dotzler, Dyck, Laughlin and Alspaw?
 7 A. No.
 8 Q. Did you ever see a credit report on the
 9 Plaintiffs to this lawsuit?
 10 A. No.
 11 Q. Was there ever any need to obtain credit
 12 reports on volunteers in The Perot Petition
 13 Committee during this period, March through June?
 14 A. No.
 15 Q. As treasurer, did you assess that there
 16 was any need to obtain credit reports on any
 17 volunteers?
 18 A. No.
 19 Q. Did you ever request that a company by
 20 the name of Equifax provide The Perot Petition
 21 Committee with any information from the credit
 22 files of these four Plaintiffs in this lawsuit?
 23 A. No.
 24 Q. Did you ever instruct anyone to obtain
 25 information from the credit database of Equifax on

1 these four Plaintiffs?
 2 A. No.
 3 Q. Did anyone ever provide you with
 4 information that appeared to be from Equifax
 5 related to these four Plaintiffs during this
 6 period, March through June of 1992?
 7 A. No.
 8 Q. Did you ever instruct anyone at any time
 9 to obtain data from any reporting, credit-
 10 reporting agency on any of the Plaintiffs to this
 11 lawsuit?
 12 A. No.
 13 Q. Did you ever at any time request that
 14 anyone obtain information from a credit database
 15 on any volunteer in connection with the petition
 16 effort?
 17 A. No.
 18 Q. Were you ever presented with such
 19 information?
 20 A. No.
 21 Q. Did you ever see such information from
 22 Callahan & Gibbons?
 23 A. No.
 24 Q. Now, there was some discussion earlier
 25 of a document that was dated April 7th that you

HUGHES & LUCS, L.L.P.
ATTORNEYS AT LAW
1777 MAIN STREET
SUITE 2000
DALLAS, TEXAS 75201
TEL (214) 930-0000
FAX (214) 930-0000
TELEX 730030

May 14 12 25 PM '92

400 MAIN STREET
SUITE 1300
HOUSTON, TEXAS 77002
TEL (713) 754-9700
FAX (713) 754-9700

400 MAIN STREET
SUITE 1300
HOUSTON, TEXAS 77002
TEL (713) 754-9700
FAX (713) 754-9700

Direct Dial Number
(214) 716-0001

May 13, 1992

VIA FEDERAL EXPRESS

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

Re: Purot Poshion Committee (FEC Identification No. C00263145)

Ladies and Gentlemen:

Pursuant to 11 C.F.R. §102.2, enclosed please find a letter in lieu of FEC Form 1, which amends the Statement of Organization, originally dated March 25, 1992, of the Purot Poshion Committee.

Please file stamp the enclosed additional copy of this letter with attachments and return it to me in the enclosed Federal Express envelope.

Please call me at the number listed above with any questions or comments. Thank you for your assistance.

Very truly yours,

Michael G. Dickerson
Ross Clayton Medford

RCM/mth
enclosure

May 14 12 25 PM '92

20000270.00.0

I hereby certify that this document is a complete and accurate copy of the original document on file with the Federal Election Commission.

3/21/97 *Michael G. Dickerson*
Michael G. Dickerson
ES&S, Public Records

EXHIBIT

G-1

PEROT PETITION COMMITTEE
P.O. Box 87766
Dallas, Texas 75281-7766
Telephone (214) 788-0000

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
MAY 11 12 15 PM '92

May 11, 1992

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

Re: Perot Petition Committee (FEC Identification
No.C00263145)

Ladies and Gentlemen:

Pursuant to 11 C.F.R.§102.2, this letter is filed to amend our
Statement of Organization, originally dated March 25, 1992, as follows:

Item 9 of our Statement of Organization is hereby amended in
accordance with 11 C.F.R. §§101.1, 102.2, and 103.2 to include
those banks or other depositories listed on Exhibit A hereto
as additional banks or other depositories in which the Perot
Petition Committee deposits funds, holds accounts, rents
safety deposit boxes or maintains funds.

I certify that I have examined this letter and to the best of my
knowledge and belief it is true, correct and complete. Please call me
at (214) 788-3030 with any questions or comments you may have.

Very truly yours,

Perot Petition Committee

By:

Mike Pess
Mike Pess, Treasurer

93043363130923

EXHIBIT: A

Security Pacific Bank
811 East 16th Avenue
Anchorage, Alaska 99503

One Bank
300 West Capitol
Little Rock, Arkansas 72001

Union Bank & Trust
100 Broadway
Denver, Colorado 30209

Fleet Bank
4707 Main Street
Bridgeport, Connecticut 06606

Industrial Bank of Washington
4812 Georgia Avenue, N.W.
Washington, D.C. 20004

Barnett Bank of Tallahassee
Main Office
315 South Calhoun Street
Tallahassee, Florida 32301

Barnett Bank of Broward County, N.A.
2929 East Commercial Boulevard
Ft. Lauderdale, Florida 33308

Barnett Bank of Northwest Florida
189 Northeast Eglin Parkway
Ft. Walton Beach, Florida 32548

Barnett Bank of South Florida, N.A.
1414 Alton Road
Miami, Florida 33139

Barnett Bank of Pinellas County
One Progress Plaza
St. Petersburg, Florida 33701

NBD Park Ridge Bank
1 South Northwest Highway
Park Ridge, Illinois 60068

Bank One
111 Monument Circle
Indianapolis, Indiana 45277

Metcalf State Bank
P.O. Box 4249
Overland Park, Kansas 66204

9804306313924

Citizens Fidelity Bank & Trust Company
1250 Bardstown Road
Louisville, Kentucky 40204-1333

Worvest Bank Minnesota
85 East Fifth Street
St. Paul, Minnesota 55101

Central Bank
238 Madison
Jefferson City, Missouri 65101

First Citizens Bank
P.O. Box 578
Bozeman, Montana 59715

United Jersey Bank/Central N.A.
3140 Princeton Pike
Lawrenceville, New Jersey 08648

First Interstate Bank
3433 South Maryland
Las Vegas, Nevada 89109

EAB
114 Old County Road
Mineola, New York 11501

Chemical Bank
30 Rockefeller Plaza
New York, New York 10112

United Carolina Bank
310 East John Street
Matthews, North Carolina 28105

Bank Center One
1101 East Interstate Avenue
Bismarck, North Dakota 58501

Bank One
65 East State Street
Columbus, Ohio 43271-0333

Boatmans Bank of Oklahoma
P.O. Box 25189
120 N. Robinson
Oklahoma City, Oklahoma 73215

First Interstate Bank of Oregon
1300 S. W. Fifth Avenue
Portland, Oregon 97201

98043863140925

Old Stone Bank
36 S. Main St.
Providence, Rhode Island 02903

Peoples Federal Savings & Loan Association
2200 Oak Street
Myrtle Beach, South Carolina 29577

First American National Bank
3021 West End Avenue
Nashville, Tennessee 37203

Chittenden Bank
2 Burlington Square
Burlington, Vermont 05402

U.S. Bank of Washington
Fourth & Battery Branch
2411 Fourth Avenue
Seattle, Washington 98101

Putname County Bank
P.O. Box 308
Hurricane, West Virginia 25526

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PLEASE REMOVE ONE OF THESE LABELS AND
PLACE IT ABOVE THE AIRMAIL PERCH

5071005424
5071005424

5071005424

5-13-92

Clayton Malford

214 716-6501

Perot Petition Committee

Federal Election Committee

6005 2nd Precinct, Suite 150

999 E Street, N.W.

2nd Floor

Room

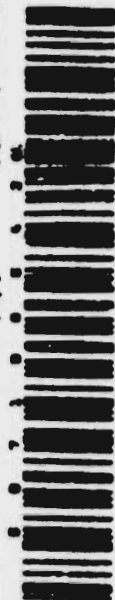
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Washington

D.C.

20002

2000/270



5071005424

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Public Election Commission
P.O. Box 1000, Ottawa, K1P 1H1
Telephone (613) 716-6000

02 JUN 12 PM 4:00

Ross Clayton Mather
General Counsel

June 10, 1992

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

RE: Petition Committee
(I.D. No. C00243145)

Dear Chairman Atkins:

Enclosed please find an amendment by letter to the Petition Committee Form 1.
Please file stamp the additional copy of this letter and return to me in the enclosed Federal
Express envelope.

If you should have any questions, please do not hesitate to contact me at 214/716-6001.

Very truly yours,

RCM
Ross Clayton Mather

RCM/sm
Enclosures

98043863143

92037524794

EXHIBIT
G-2.

I hereby certify that this document is a duplicate
and accurate copy of the original document on file
with the Federal Election Commission.

3/27/92 *Adonis*
Date Michael G. Dickerson
Chief, Public Records

Perot Petition Committee
P.O. Box 10000
Washington, D.C. 20000

Mike Poon
Treasurer

June 10, 1992

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

RE: Perot Petition Committee
(I.D. No. C00263145)

Dear Chairman Aikens:

Pursuant to 11 CFR Sec. 102.2, this letter is filed to amend our Statement of Organizations. Item 9 of the Statement is amended to include the banks or other depositories listed on Attachment 1. Item 9 of the Statement is also amended to cross-out banks or other depositories listed on Attachment 2. The Perot Petition Committee no longer maintains accounts at the institutions listed on Attachment 2.

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

Sincerely,

Mike Poon

Mike Poon

MP/ss
Enclosures

980920387524495

First National Bank of Anchorage
P.O. Box 160720
Fairbanks, AK 99707

Bank of Fayetteville
One South Block Street
Fayetteville, AR 72701

First National Bank of Fort Smith
602 Garrison Avenue
Fort Smith, AR 72901

Valley National Bank of Arizona
728 W. Ajo Way; P.O. Box 7577
Tucson, AZ 85713

Delaware Trust Company
101 Locockerman St.
Dover, DE 19901

Barnett Bank of Northwest Florida
189 Northeast Eglin Parkway
Ft. Walton Beach, FL 32548

Barnett Bank of Jacksonville, N.A.
10445 San Jose Blvd.
Jacksonville, FL 32257

Barnett Bank of Naples
385 14th Avenue South
Naples, FL 33940

Barnett Bank of Palm Beach County
1224 U.S. Highway One
North Palm Beach, FL 33408

Barnett Bank of Central Florida
105 East Robinson Street #100
Orlando, FL 32801

First American Bank
300 College Avenue
Athens, GA 30601

Wachovia Bank of Georgia, N.A.
Mulberry St. at Third
Macon, GA 31202

Wachovia Bank
6301 Abercorn Street
Savannah, GA 31405

9 8 0 4 3 8 6 5 2 4 7 9 6

Pioneer Federal Savings Bank of Hawaii
900 Fort St.
Honolulu, HI 96813

Brenton Bank, N.A.
2840 Ingersoll Avenue
Des Moines, IA 50312

Key Bank of Idaho, Capital Center Office
702 West Idaho St. (P.O. Box 2800)
Boise, ID 83702

First of America Bank-Northwest Illinois
325 N. Milwaukee Street
Libertyville, IL 60048

Premier Bank
3554 South Sherwood Forest Blvd.
Baton Rouge, LA 70821

Commerce Bank of Springfield
1661 Boonville
Springfield, MO 65801

Trustmark National Bank
P.O. Box 291
Jackson, MS 39205

North Carolina Nations Bank - North Mills Office
P.O. Box 27287
Raleigh, NC 27611

United New Mexico Bank
Suni at San Mateo SE
Albuquerque, NM 87108

Mutual Building & Loan Association
510 South Main
Las Cruces, NM 88001

Endicott Trust
89-91 Court St.
Binghamton, NY 13901

Key Bank N.A.
2 Brinkerhoff St.
Plattsburgh, NY 12901

South Carolina National Bank
1401 Main St.
Columbia, SC 29226

9 8 0 4 3 8 7 5 2 4 7 9 7

American State Bank
701 S. 2nd Street
St. Paul, MN 55102

980920386314798

ATTACHMENT 3
(Anchorage, Alaska)

Security Pacific Bank
811 E. 36th Avenue
Anchorage, AK 99503

One Bank
300 W. Capital
Little Rock, AR 72001

Union Bank & Trust
100 Broadway
Denver, CO 80209

MBD Park Ridge Bank
1 South Northwest Highway
Park Ridge, IL 60068

Central Bank
238 Madison
Jefferson City, MO 65101

Seattle First National (Seafirst Bank)
1649 Duvall Ave. NE
Renton, WA 98059

First Interstate Bank of Wyoming
P.O. Box 233
Riverton, WY 82501

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

KEVIN LAUGHLIN, EDWARD DYCK)
and CARRIE ALSPAW)
Plaintiff,)
vs.) CONSOLIDATED
) Civil Action No.
) 3-95-CV-2577-R
ROSS PEROT, MARK ALAN)
BLAHNIK and THE CALLAHAN &)
GIBBONS GROUP,)
Defendants.)

* * * * *

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MARK DOTZLER,)
Plaintiff,)
vs.) CIVIL ACTION NO.
) 4:94CV00887 CFG
ROSS PEROT, et al.,)
Defendants.)
and)
KEVIN LAUGHLIN, EDWARD DYCK)
and CARRIE ALSPAW,)
Plaintiffs,)
vs.) CIVIL ACTION NO.
) 4:94CV00888 CFG
H. ROSS PEROT, THE PEROT)
PETITION COMMITTEE, MARK)
ALAN BLAHNIK, THE CALLAHAN)
& GIBBONS GROUP, U.S.) VIDEO DEPOSITION
DATALINK, INCORPORATED,) SANDRA STONE MCCLURE
EQUIFAX CREDIT INFORMATION)
SERVICES, TRW, INC.,) MAY 23, 1996
RUSS MELBYE, and SANDRA)
STONE MCCLURE,)
Defendants.)


EXHIBIT

H

Taylor & Associates Reporting, Inc.

COURT REPORTERS

SUITE 920
906 OLIVE STREET
ST. LOUIS, MISSOURI 63101
PHONE: (314) 621-3777
1-800-280-DEPO

DEPONET. 

98043863150

1 A To the City of St. Louis.
 2 Q To St. Louis. What was your purpose in
 3 coming down here?

4 A There were complainers and problem
 5 people nationwide, and I wanted to know by discussing
 6 with the people who were making complaints against
 7 the St. Louis office, Laughlin, Dyck, Dotzler,
 8 whatever, if those people seemed to have legitimate
 9 complaints and just to visit with them and have them
 10 talk to me, that was part of my investigation,
 11 research, background, whatever.

12 Q And had you conducted that prior to the
 13 time you met with Mr. Dyck and Mr. Laughlin on May
 14 19, 1992?

15 A Yes, I did that on the 17th and met
 16 with those volunteers in St. Louis.

17 Q At the time you made these statements
 18 to Mr. Laughlin and Mr. Dyck in that meeting, did you
 19 believe that the things you were telling them were
 20 true?

21 A Yes.

22 Q And what did you base that on?

23 A Let's see, the volunteers had given
 24 information, I had independently checked to see that
 25 their information and their complaints were correct

1 and had some legitimacy, and I had discussed some
 2 things I knew to be in one way, I called Laughlin and
 3 asked him and he denied that what I had verified from
 4 other sources was true.

5 Q One of the other allegations that they
 6 had made in their lawsuit is that during the period
 7 these events took place in April, May and June of
 8 1992, is that you had a close personal working
 9 relationship with Ross Perot. Had you ever met Mr.
 10 Perot during that period? April, May - March,
 11 April, May.

12 A Of '92?

13 Q 1992?

14 A Never, ever.

15 Q During this period when you were
 16 conducting your investigation and talking to these
 17 volunteers, had you ever even spoken with Mr. Perot?

18 A No.

19 Q They also allege that at that time you
 20 may have been acting as a salaried employee of Mr.
 21 Perot. Have you ever been a salaried employee of
 22 Ross Perot?

23 A No.

24 Q Did Mr. Perot ever authorize you to
 25 take any action as it relates to Mr. Dyck, Mr.

1 Laughlin, Mr. Dotzler or Ms. Alapaw in this lawsuit?

2 A No.

3 Q Now let's go back to the period when, I
 4 think we talked about this in Exhibit 36, when you
 5 took some notes of a conversation that you had had
 6 with Mr. Laughlin, and it states there that Mr.
 7 Laughlin is bowing out. At any time during this
 8 discussion that took place on April 28th, 1992, did
 9 Mr. Laughlin ever tell you that he had been fired,
 10 terminated or removed by the Perot Petition

11 Committee?

12 A No.

13 Q Did Mr. Laughlin ever tell you that Mr.
 14 Melbye, Mr. Monroe, Mr. Mufford or Mr. Blahnik had
 15 fired, terminated or removed him?

16 A No.

17 Q Did he indicate in any way that Ross
 18 Perot had taken any action to fire, terminate or
 19 remove him from his position in Missouri for Perot?

20 A No.

21 Q Were these self-appointed positions in
 22 Missouri for Perot during this time period March,
 23 April, May, June of 1992?

24 A Yes, they were all kind of self-
 25 appointed.

1 Q How else were persons selected for
 2 positions if it was not self-appointment?

3 A You see, at the - when Laughlin,
 4 Dotzler and Dyck withdrew, pulled out or they said
 5 they're bowing out and they're out of it and all
 6 that, after that point when it got to a point where I
 7 was going to become a new person called the State
 8 Coordinator, then I called all the various
 9 coordinators with the exception of those three,
 10 because they already said they supported me by
 11 telephone, and you know, I said this is where we are
 12 and then Justin Perry also called them and said he
 13 wanted to do it, and then they said no, they'd rather
 14 have me do it, and I said fine.

15 Q So the Missouri volunteers elected you
 16 to that position?

17 A Yes, they were volunteers, all of them

18 Q During this March, April, May and June
 20 time period in 1992, did the Perot Petition Committee
 21 ever appoint you to any position in Missouri for
 22 Perot or the Perot Petition Committee?

23 A No.

24 Q To your knowledge, did the Perot
 25 Petition Committee ever appoint any volunteer during

1 that period to any position in Missouri for Perot or
2 the Perot Petition Committee?

3 A. No.

4 Q. During this time period March, April,
5 May, June of 1992, did Ross Perot ever appoint you to
6 any position in Missouri for Perot or the Perot

7 Petition Committee?

8 A. No.

9 Q. We have talked about the May 19th
10 document in some detail, I believe that is Exhibit
11 Number 37 in your deposition, Ms. McClure. One of
12 the allegations made by the Plaintiffs in both the
13 Dallas and the Missouri litigation is that the May
14 19th document was written by or on behalf of Melbye,
15 the Perot Petition committee and Ross Perot.

16 Did Mr. Melbye, Mr. Perot or anyone at
17 the Perot Petition Committee have any role in
18 drafting that document?

19 A. No.

20 Q. I think you testified that this was a
21 document that you drafted at night in your hotel room
22 the day before you handed it to these gentlemen, is
23 that correct?

24 A. May 18th, that's correct. May 18th.

25 Q. And you were the person who actually

1 handed the May 19, 1992 document to Mr. Dyck and Mr.
2 Laughlin in that meeting, is that correct?

3 A. Yes.

4 Q. At the time you drafted this document,
5 were you drafting this document on behalf of the
6 Perot Petition Committee, Ross Perot or Russ Melbye?

7 A. No.

8 Q. Had Mr. Perot, anyone at the Perot
9 Petition Committee or Russ Melbye instructed or
10 authorized you to draft this document and provide it
11 to these gentlemen?

12 A. No.

13 Q. Had they approved the document before
14 you handed it to these gentlemen?

15 A. No.

16 Q. Had Mr. Perot or Mr. Melbye
17 participated in any way in the investigation that led
18 up to this document?

19 A. No.

20 Q. Now one of the allegations they make
21 about this document, Ms. McClure, is that at the time
22 you drafted this document, you knew certain statements
23 made in here as it relates to them was false. Did
24 you, at the time you drafted this document, believe
25 any of these statements contained in Exhibit 37 to be

1 false?

2 A. No.

3 Q. And what did you base those statements
4 on that are contained herein?

5 A. Interviews, first off it was

6 conversations with volunteers, interviews with
7 volunteers, I came over specifically on the 17th to
8 verify that these things were right, I discussed that
9 with the District Coordinators around the State with
10 the exception of 1st, 2nd and 3rd District, I didn't
11 ask their opinion, and then after I visited with the
12 people on the 17th, I went back to my room, made some
13 scribbles and whatever, probably made some mental
14 notes anyway and then on the 18th I went into the
15 office and met with Laughlin and Dyck and the people
16 you know were in the little room.

17 Q. Right.

18 A. And then afterwards they stayed, Dyck
19 and Laughlin stayed in a closed door meeting there
20 thinking I left the office and I stayed all around
21 the office and visited with volunteers in the phone
22 room, with Phil Palmer out in the office.

23 I think that's the first time I ever
24 saw Perry Mickelboast or whatever, it's an unusual
25 name, he was at the computer, Pat Salom was a person

1 who was working in there at the time, and so I just
2 asked them all sorts of questions, not telling them
3 what I was going to do, but asking them how things
4 were and they showed me this box of messages that had
5 come in that they had been just taking names of
6 people who had called in and wanted buttons, bumper
7 stickers and T-shirts and they would put those
8 receipts up there, these memo notes up there, and
9 then they asked me why -- I had a button on and they
10 said Oh God, where did you get that button, we can't
11 get anything, see, that's when I felt so poorly and
12 that's when I -- never mind.

13 Q. Ms. McClure, would you have put these
14 statements in the May 19, 1992 document if you had
15 not believed they were true?

16 A. I believe everything in there is true
17 and I certainly wouldn't have put it in writing if I
18 didn't believe it was true.

19 Q. You were shown a couple of other
20 Exhibits, Exhibits Number 38 and Exhibit Number 39, I
21 believe you indicated that you drafted these two
22 documents.

23 A. Hold them up and maybe I can figure it

24 out. The numbers, again?

25 Q. 38 and 39.

1 A Here's 38.
 2 MR. KOHN: Here's 38 and 39.
 3 Q (By Ms. Askew) I think you indicated
 4 that you drafted those?
 5 A Yeah, yes.
 6 Q Did you draft these on instructions of
 7 anyone from the Perot Petition Committee?
 8 A No.
 9 Q Did you draft these on instructions of
 10 anyone representing Ross Perot?
 11 A No.
 12 Q Did you draft these on the instructions
 13 of Ross Perot?
 14 A No.
 15 Q There has been discussion of a May 29th
 16 press conference that took place at the Adams Mark
 17 Hotel, and I think you indicated that you asked Phil
 18 Palmer to set that up on May 28th.
 19 A Probably the 28th is what I think.
 20 Q Did the Perot Petition Committee ever
 21 give you any instructions, directions or supervision
 22 as to what was to take place at that press
 23 conference?
 24 A No, none.
 25 Q Did Ross Perot ever give you any

1 instructions, directions, or supervision as to what
 2 was to take place at the press conference?
 3 A No.
 4 Q Did they give you any information to
 5 release at the press conference?
 6 A No.
 7 Q Was any representative of the Perot
 8 Petition Committee in Dallas present at the press
 9 conference?
 10 A No.
 11 Q Did they improve in advance of that
 12 press conference any language that you had in a press
 13 release?
 14 A No.
 15 Q Mrs. McClure, when you were engaged in
 16 your activities on behalf of Missouri for Perot in
 17 March, April, May and June of 1992, were you at any
 18 time acting on behalf of the Perot Petition Committee
 19 in Dallas?
 20 A No.
 21 Q When you were engaged in your
 22 activities on behalf of Missouri for Perot in March,
 23 April, May and June of 1992, were you ever acting on
 24 behalf of Ross Perot?
 25 A No.

1 Q Were you employed by them at any time
 2 during that period?
 3 A '92?
 4 Q Yes.
 5 A No.
 6 MS. ASKEW: I don't have any further
 7 questions.
 8 MR. KOHN: I have no questions. I have
 9 no questions.
 10 (WHEREIN, a brief discussion was held
 11 off the record.)
 12 REDIRECT-EXAMINATION
 13 QUESTIONS BY MR. REEKS.
 14 Q Ms. McClure, following up on some of
 15 the questions that were asked you by the other
 16 parties in this lawsuit. You had responded to a
 17 question by Mr. Dotzler concerning the Declarations
 18 of Candidacy and I was following up on that. How
 19 many of the Declarations of Candidacy had you
 20 received back from electors prior to May 28th, 1992?
 21 A I said I didn't know. However, it
 22 leads me to believe, since I was pressing so hard for
 23 those, that maybe Hal Gibbs said he had everybody's
 24 but those, that may be the explanation for me
 25 pressuring them to get me those back.

1 Q Do you know that you had any of the
 2 Declarations of Candidacy back from the electors -
 3 A They didn't come back to me, I'm sorry,
 4 you haven't finished your question, but they didn't
 5 come back to me.
 6 Q Okay. Do you know that any of the
 7 Declarations of Candidacy had come back from the
 8 electors prior to May 28th, 1992?
 9 A Some had come back, Hal Gibbs told me,
 10 Q Did he indicate to you how many had
 11 come back?
 12 A Probably, and I don't remember today.
 13 Q Would those have been sent back
 14 directly to Mr. Gibbs?
 15 A Yes.
 16 Q When had you sent out the Declarations
 17 of Candidacy to the other electors?
 18 A They all got them at the same time at
 19 one point, and then these last two, I believe were
 20 reproduced again on a copier and sent again to Dyck,
 21 Dotzler and Laughlin. I believe that's the way it
 22 went.
 23 Q Okay. Were the Declarations of
 24 Candidacy for the electors other than Mr. Dyck, Mr.
 25 Dotzler and Mr. Laughlin, sent out prior to May 28,

1 Q. Okay. And what's the name of the
2 organization that's listed?

14:09:33 A. Missouri for Perot Petty Cash.

14:09:37 Q. Can I see that again? My copy doesn't
5 say that. Okay. What is the full name of the
6 organization?

14:09:56 MR. KOHN: You're asking her to read
8 what it says at the top?

14:10:00 THE WITNESS: Yeah.

14:10:04 MR. KOHN: Read what it says at the

11 too
14:10:05 THE WITNESS: Okay. In this blank it's
13 been typed in, I don't know whose direction, Perot
14 Petition Committee, d/b/a MO for Perot/Petty Cash.

14:10:07 Q. (By Mr. Reeks) And down toward the
16 middle of the page under very truly yours it says
17 name or organization and there's something that's
18 written in, do you know who wrote that in?

14:10:20 A. No, not me

14:10:36 Q. It's not your handwriting?

14:10:38 A. No

14:10:40 MR. KOHN: Where is there something in
23 handwriting

14:10:40 MR. REEKS: Right here. (indicating)

25 MR. KOHN: Oh, where it says Perot

1 have a conversation back in May of 1992 with Ruth Kay
2 concerning a \$500 campaign contribution?

14:22:52 A. She came into the office when I was in
4 the office over there and said what's going on or
5 something like that, I think.

14:22:53 Q. Okay. Did she mention the fact that
7 she had given \$500 to the Petition effort?

14:22:58 A. Yeah, I think she brought that up.

9 yeah.

14:23:05 Q. Okay. Did you check to determine what
11 happened to the \$500?

14:23:07 A. I believe it turned up as a deposit. I
13 mean there's - I've never thought the money was
14 mishandled.

14:23:15 Q. Okay. You don't have any reason to
16 believe that any funds of the Perot Petition effort
17 in Missouri or in the St. Louis office were
18 mishandled or misappropriated?

14:23:26 A. Or converted to their personal use or
20 anything like that, no.

14:23:38 Q. Okay. Have you been involved in any
22 other lawsuits other than this lawsuit?

14:23:41 A. You mean as a Plaintiff?

14:23:55 Q. As a Plaintiff or a Defendant?

14:23:58 A. A Defendant. I believe this is the

1 Petition Committee, d/b/a Missourians for Perot?

14:10:52 MR. REEKS: Right, MO for Perot.

14:10:55 MR. KOHN: M-O.

14:10:57 Q. (By Mr. Reeks) Did you ever discuss
5 Mr. Dotzler's financial situation with Mr. Laughlin
6 during May of 1992?

14:10:57 A. I don't know Mr. Dotzler's - I don't
8 know anything personal about these guys.

14:11:04 Q. Okay. Did you ever have a discussion
10 with Mr. Laughlin in which you discussed Mr.
11 Dotzler's financial situation?

14:11:30 A. I don't know Mr. Dotzler's financial
13 situation.

14:11:37 Q. Okay. If you would, just answer the
15 question.

14:11:40 A. Oh, I'm sorry.

17 Q. I think it was a yes or no question.

14:11:45 A. I'll try a no, then. No.

14:11:47 Q. No.

19 MR. REEKS: Let's take a short break.

21 I may be about finished. I want to check my notes.

16:20:01 (WHEREIN, a brief discussion was held
3 off the record.)

16:21:33 Q. (By Mr. Reeks) Ms. McClure, back on
25 the record now, just a few more questions. Did you

1 only one, I believe this is the only one forever.

2 This is only my second deposition in my life, so -

14:24:01 Q. What was your first deposition?

14:24:09 A. You. Was that a year ago?

14:24:11 Q. Okay.

5 MR. KOHN: Yeah. You took her
7 deposition once before.

14:24:14 THE WITNESS: (He took my deposition a

9 year ago.

14:24:17 MR. KOHN: That was the jurisdiction.

14:24:20 MR. REEKS: Yeah, and that was in this

12 case, in this lawsuit that we're involved in here
13 today.

14 THE WITNESS: They're all intermingled.

15 I don't know how they're all separated out.

14:24:28 Q. (By Mr. Reeks) But other than this
17 lawsuit that's brought by Mr. Dyck and Mr. Laughlin
18 and Ms. Alapew and Mr. Dotzler, have you been
19 involved in any other lawsuits either as a Plaintiff
20 or a Defendant?

14:24:33 A. I think I had to sue the insurance
22 company one time.

14:24:36 Q. When was that?

14:24:46 A. I don't know. Last some odd years, I
25 think we had to demand that they pay a bill. I

1. believe that's all.

14:24:58 Q. Are you familiar with Pat Owens?

14:24:59 A. I vaguely remember a name. You'll have
1 to ask — you'll have to describe it to me, maybe I

5. can tell whether it's a man or a woman, what is it?

14:25:09 Q. Are you familiar with someone named Pat
7. Owens from the State of Wisconsin?

14:25:19 A. Is that a man or a woman?

14:25:24 Q. I believe it's a woman, I'm not

10. positive.

14:25:28 A. Then maybe I might — the name is

12. vaguely familiar, so I don't know, but maybe I would.

14:25:32 Q. Okay. What is your recollection of Pat

14. Owens?

14:25:35 A. I don't have a real recollection, the

16. name is vaguely familiar. If you can describe it

17. some more, maybe I can tell you something. Who was

18. she, and maybe I can tell you?

14:25:38 Q. My information is she was with United

20. We Stand America in the State of Wisconsin.

14:25:41 A. Was she a State Director?

14:25:50 Q. That's the information we have.

14:26:02 A. Then I probably do know who she is,

23. yeah

14:26:05 Q. Do you have any other recollection of

1. Ms. Pat Owens?

14:26:08 A. We got along well and she called and

3. said she was no longer employed and I don't remember

4. anything else.

14:26:20 Q. (By Mr. Reeks) Who was paying your

6. legal fees for the defense of this lawsuit?

14:26:30 MR. KOHN: I'm going to object to that

8. and instruct her not to answer.

9. MS. ASKEW: I object on the basis of

10. relevance.

14:26:36 THE WITNESS: Nobody is paying me a

12. salary.

14:26:57 MR. KOHN: I object to that and

14. instruct you not to answer. Now you just —

15. THE WITNESS: I'm sorry.

16. MR. KOHN: (continuing) — pay

17. attention to your lawyer when he tells you to do it.

18. Q. (By Mr. Reeks) Are you refusing to

19. answer based on the instruction from your counsel?

14:27:11 MR. KOHN: I'm instructing her not to

21. answer.

14:27:15 THE WITNESS: Yeah.

23. MR. REEKS: That's all the questions I

24. have, thank you.

14:27:19

CROSS-EXAMINATION

QUESTIONS BY MR. STRIBLING:

14:27:35 Q. Ms. McClure, my name is Carol

4. Stribling. I represent Equifax Credit Information

5. Systems, Inc. which is also one of the Defendants in

6. this case. I have just several questions for you.

7. You indicated earlier in your testimony

8. that Mr. Reeks was asking you that you had never seen

9. a credit report with respect to any of the Plaintiffs

10. in this lawsuit.

14:28:34 A. Right.

14:28:57 Q. Okay. Has anybody ever discussed a

13. credit report with respect to any of the Plaintiffs

14. with you or mentioned a credit report?

14:28:59 A. No, not discussed nor mentioned.

14:29:07 Q. Has anyone ever discussed or mentioned

17. with you any financial matters about the Plaintiffs

18. or where they were employed or whether they were

19. employed or what their business dealings or that sort

20. of thing were?

14:29:11 A. No.

14:29:25 Q. There's been some testimony in a prior

23. deposition, I'd like to ask you a question, at the

24. May 19th meeting or at any time and you know what I'm

25. talking about when I say the May 19th meeting at the

1. St. Louis headquarters.

14:29:26 A. Yes.

14:29:42 Q. Or at any time prior to that, did you

4. ever have occasion to question or make any comment

5. about the propriety of having any one of the

6. Plaintiffs, and in particular, I'm thinking of Mr.

7. Dotzler, handle money because of his financial

8. condition or employment status or whether he had a

9. lot of money or was broke or anything of the like?

14:29:52 A. Did I say that, is that what you're

11. saying? Did I at any point say that?

14:30:06 Q. Yeah.

14:30:11 A. I don't believe I ever said that.

14:30:12 Q. Did anybody ever discuss with you that

15. any one of the Plaintiffs might be in financial

16. difficulty or broke or impecunious or anything like

17. that?

14:30:13 A. I don't know the impecunious one, I'm

19. sorry.

14:30:27 Q. Lacking money.

14:30:30 A. Oh, I'm sorry.

14:30:32 Q. Broke.

14:30:33 MS. ASKEW: Can you speak up a little

24. bit, Carol? I can't hear you with that door open.

14:30:35 THE WITNESS: I didn't — I'm sorry, I

1 THE WITNESS: Perhaps if I repeated my
2 question for you.

3 Q. Okay. Can you recall ever having a
4 discussion in October of 1992, or maybe a month
5 either side during that period with anyone from
6 Dallas, the Perot effort, Presidential effort in
7 Dallas?

8 A. Now wait. We've got a candidate on a
9 ballot, now you're throwing in November which is
10 electoral period. Go ahead, ask, ask something.

11 I'll do my best, go ahead

12 Q. Can you recall ever having a discussion
13 during October or November of 1992, with anyone from
14 the Perot organization in Dallas about newspaper
15 articles or accounts which were appearing discussing
16 background checks or investigations of electors which
17 had been made?

18 A. I think this is the fifth time. Never,
19 ever, in the history, prior ever daylight to this day
20 I have never had any discussion about a background
21 checks, credit checks or anything, ever, period. So
22 phrase it anyway you want, I have nothing, no
23 knowledge of it, nothing. I'm finished with my

24 questions

25 MR. STRIBLING: I have no further

1 what the media said.

2 Q. When the rePetition decision was made,
3 how many Declarations of Candidacy had you received
4 at that time from the other electors?

5 A. I don't know.

6 Q. Do you know the names of any electors
7 you did receive them from?

8 A. No, I can't recall, they were received,
9 I just don't know who they were from.

10 Q. Do you have those?

11 A. No.

12 Q. Where would they have gone?

13 A. For the second group, or the first
14 group?

15 Q. First group.

16 A. If they were there, they probably went
17 with Hal Gibbs' files to Mr. Perot in Dallas.

18 Q. Hal Gibbs had them?

19 A. In 1992.

20 Q. Who authorized the opening of the bank
21 account in Springfield?

22 A. Which bank account?

23 Q. The one where you signed this document

24 on April 22nd?

25 A. The organization, the Missouri

1 questions.

2 MR. KOHN: It's reached the point of
3 harassment, and I think if this is asked again, I
4 might seek sanctions --

5 MR. STRIBLING: I have no further

6 questions.

7 MR. KOHN: Well thank goodness.

8 CROSS-EXAMINATION

9 QUESTIONS BY MR. DOTZLER:

10 Q. Ms. McClure, my name is Mark Dotzler,
11 I'm a Plaintiff in this litigation. I just want to
12 ask you a couple questions.

13 A. Okay.

14 Q. Did you consider the second slate of
15 electors as being committed to Ross Perot?

16 A. Yes.

17 Q. Did you know that Hal Gibbs and Mike
18 Pender, who were electors, hosted a press conference
19 supporting President Bush on the day that you turned
20 in the Pollsters?

21 A. After the -- yeah, it was that day and
22 after Mr. Perot had withdrawn from the race.

23 Q. Did you know they called him a major
24 fake in that press conference?

25 A. I don't know if they did or if that was

1 organization.

2 Q. Dallas wasn't involved in that?

3 A. They were sending some money and I
4 don't know what money, but they were sending money to

5 put in.

6 Q. They were sending money on April 22nd.

7 A. On April 22nd it looks like.

8 Q. How much money, do you know?

9 A. No, but the notes there, what we were
10 guessing \$10 or \$11,000, I don't know that. But I
11 don't know that they sent it, Mr. Dotzler, I have no
12 idea for sure.

13 Q. What was that money to be used for?

14 A. You had to only spend it in certain
15 categories, rent for the office, you couldn't pay an
16 individual, I couldn't write checks for myself, we
17 could pay phone bills, if those people were the
18 District Coordinators, if we had enough funds for
19 printing, but no person could be paid any money,
20 including me.

21 Q. Why would they have been sending that
22 to you on April 22nd, if Kevin Laughlin was the State
23 Coordinator?

24 A. You see, I don't even know, that's why
25 I'm not even sure the whole darn thing being done

1 except I still signed that, so Missouri for Perot was
2 going to Richard, John Richards, John Richards is in
3 the 7th District, that's where I am, so I don't know
4 the whole deal about that piece of paper anyway,
5 except I recognize my signature and John Richards was
6 the State Treasurer, and possibly approved by
7 Laughlin.

5:07:22 Q. Okay. Do you have a copy of the
8 Missouri Election Laws?

5:07:54 A. Not with me, no.

5:07:57 Q. Did you have one at that time?

5:08:00 A. Section 115 Laughlin did, Dyck did, I
13 think you did, Laughlin said you all had those copies
14 and I had a little handbook that said Section 115.

5:08:02 Q. You did have

5:08:13 A. Yes

5:08:14 Q. And you had that in March of '92?

5:08:15 A. I don't know because I joined in March
19 18th is when I called Dallas to see — that's when I
20 heard the speech by Mr. Perot, so I either called
21 March 18th or March 19th to Dallas and then I was
22 told to call the Secretary of State's office, so a
23 period of days, hours were passing. At some point I
24 had a copy of the Section 115 Missouri Election Laws,
25 right.

5:08:19

5:08:43 Q. Do you think you had it in April?

5:08:45 A. I don't know, maybe.

3 Q. Okay. Did you ask the Missouri
4 Attorney General or any other law enforcement agency
5 to investigate Kevin Laughlin, Ed Dyck and myself?

6 A. No. No. Do you know the attorney
7 general doesn't work for me? Sorry.

5:09:01 MR. KOHN: Just answer the question.

5:09:03 THE WITNESS: I apologize. I

10 apologize.

5:09:10 MR. KOHN: I'll move to strike that
12 now, it's not responsive, just as a little warning to
13 you.

5:09:16 THE WITNESS: I'm tired, I'll be good.

16 MR. KOHN: I know you're tired, it's
17 been two long days. But you listen to Mr. Dotzler's
18 question and you answer it, and don't make any

19 remarks beyond that —

5:09:18 THE WITNESS: I won't.

5:09:20 MR. KOHN: (continuing) — and that
21 way it will end earlier and you'll be home earlier.

5:09:22 THE WITNESS: Okay. Thank you. Go

23 ahead, Mr. Dotzler.

5:09:24 Q. (By Mr. Dotzler) Okay. Why was my
25 name on the May 19th document?

5:09:25

1 A. Laughlin and Dyck always said that you
2 all were a trio in things that you did.

5:09:33 Q. So the charges that were mentioned in
4 the May 19th document you just assumed they were
5 against me, also?

5:09:44 A. I was told, because we couldn't tell
7 how involved you were.

5:09:51 Q. Did you know that my activity with
9 Missouri for Perot stopped on April 27th?

5:09:53 A. I don't remember.

5:10:05 MR. KOHN: I'm going object to that,

12 because it assumes a fact not in evidence and the
13 interrogator cannot both be a witness and interrogate
14 the questioner, the answerer. So whether it did or
15 not as far as I know, not in evidence. Go ahead, Mr.
16 Dotzler. I will let her answer subject to that
17 objection.

5:10:28 MR. DOTZLER: That's okay. That's all
19 I wanted to ask, thank you.

20 THE WITNESS: Was I aware that you had
21 resigned or something like that?

5:10:30 Q. (By Mr. Dotzler) Yes.

23 A. I don't know that, I don't remember

24 that, I don't deny that.

5:10:35 Q. You mentioned several things that I was

25

1 doing after that date. Do you know for a fact that I
2 was doing those things?

5:10:40 A. What things.

5:10:49 Q. I think you mentioned that I had
5 answered the phone at Mr. Dyck's home.

5:10:49 A. I don't know if you were in Mr. Dyck's
7 home.

5:10:55 MR. DOTZLER: That's all I want to ask,
9 thank you.

5:10:58 (CROSS-EXAMINATION)

11 QUESTIONS BY MS. ASKEW:

5:11:25 Q. Ms. McClure, I'm Kim Askeew. I

13 represent Ross Perot and Mark Blahnik in the Dallas
14 litigation. I represent Russ Melbye and the Perot
15 Petition Committee here in the litigation pending in
16 Missouri in the Eastern District.

17 I just have some questions to ask you
18 related to the allegations that have been made in
19 this lawsuit. There have been a number of newspaper
20 articles and press releases talked about here today.
21 I think some of those articles are numbered McClure
22 Exhibits 45 through 50.

23 Did the Perot Petition Committee ever
24 authorize you to make any statement to the media?

5:12:07 A. No.

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

March 20, 1992

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

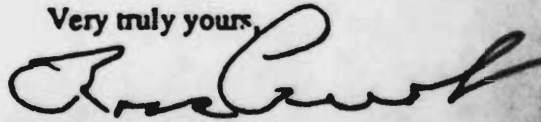
Ladies and Gentlemen:

I do not consider myself a candidate for the office of President of the United States. Depending upon the results of volunteer efforts to place my name on the ballot in 50 States, however, I may become a candidate for the Presidency. I have been advised that under rules of the Federal Election Commission at 11 CFR §100.3, I may be deemed to fall within the technical definition of a "candidate", requiring that I make certain filings. I also understand that I must designate or form a "principal campaign committee" in connection with this designation. Therefore, for purposes of ensuring full compliance with 11 CFR §101.1 and related statutes and regulations, I file this letter in lieu of FEC Form 2, and submit the following required information:

- | | |
|---|--|
| 1. Name and Address: | Ross Perot
1700 Lakeside Square
12377 Merit Drive
Dallas, Texas 75251 |
| 2. Identification No: | Not Applicable |
| 3. Party Affiliation: | None/Independent |
| 4. Office: | President |
| 5. State and District of Candidate: | Not Applicable |
| 6. Designation of Principal Campaign Committee for the 1992 Election: | Perot Petition Committee
1100 Lakeside Square
12377 Merit Drive
Dallas, Texas 75251 |
| 7. Designation of other authorized committees: | None |

I hereby certify that to the best of my knowledge and belief this information is true, correct and complete.

Very truly yours,



Ross Perot

EXHIBIT

I

AFFIDAVIT OF MIKE POSS

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

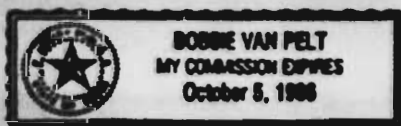
I, MIKE POSS, being duly sworn, depose and say:

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



98043863159



FEDERAL ELECTION COMMISSION
Washington, DC 20463

April 28, 1997

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

RE: MUR 4631

Dear Mr. Dyck:

This letter acknowledges receipt on April 21, 1997, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended. The respondent(s) will be notified of this complaint within five business 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 notarized and sworn to in the same manner as the original complaint. We have numbered this matter MUR 4631. 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,

A handwritten signature in dark ink, appearing to read "F. Andrew Turley".

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosure
Procedures

98043863160



FEDERAL ELECTION COMMISSION

Washington, DC 20463

April 28, 1997

John W. Lemkemeier, Esq.
Bryan Cave
One Metropolitan Square
St. Louis, MO 63101

RE: MUR 4631

Dear Mr. Lemkemeier:

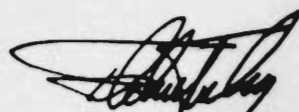
The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4631. Please refer to this number in all future correspondence.

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 Jennifer Henry at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

98043863162



FEDERAL ELECTION COMMISSION

Washington, DC 20463

April 28, 1997

H. Ross Perot
1700 Lakeside Square
Dallas, TX 75251

RE: MUR 4631

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 4631. 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 Jennifer Henry at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



F. Andrew Turley
Supervisor Attorney
Central Enforcement Docket

Enclosures

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

98043863164



FEDERAL ELECTION COMMISSION

Washington, DC 20463

April 28, 1997

Sandra Stone McClure
7439 East Farm Road, 1-70
Rogersville, MO 65742

RE: MUR 4631

Dear Ms. McClure:

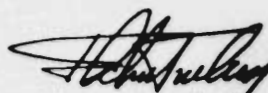
The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4631. Please refer to this number in all future correspondence.

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 Jennifer Henry at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

98043863166



FEDERAL ELECTION COMMISSION

Washington, DC 20463

April 28, 1997

Alan C. Kohn, Esq.
Kohn, Shands, Elbert, Gianoulakis &
Giljum
One Mercantile Center
St. Louis, MO 63101

RE: MUR 4631

Dear Mr. Kohn:

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 4631. Please refer to this number in all future correspondence.

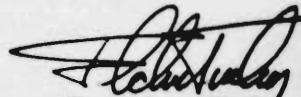
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under 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.

98043863167

If you have any questions, please contact Jennifer Henry at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

98043863168



FEDERAL ELECTION COMMISSION

Washington, DC 20463

April 28, 1997

H. Ross Perot
The Perot Group
12377 Merit Drive
Dallas, TX 75251-2239

RE: MUR 4631

Dear Mr. Perot:

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 4631. Please refer to this number in all future correspondence.

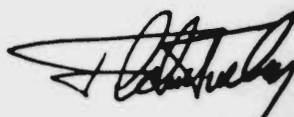
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against The Perot Group in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted 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.

9 8 0 4 3 6 3 1 6 9

If you have any questions, please contact Jennifer Henry at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

9804386317C

WASHINGTON, D.C.
NEW YORK, NEW YORK
KANSAS CITY, MISSOURI
OVERLAND PARK, KANSAS
PHOENIX, ARIZONA
LOS ANGELES, CALIFORNIA
SANTA MONICA, CALIFORNIA
IRVINE, CALIFORNIA

JOHN W. LEMKEMEIER

BRYAN CAVE LLP

ONE METROPOLITAN SQUARE
211 N. BROADWAY, SUITE 2800
ST. LOUIS, MISSOURI 63102-2750
(314) 259-2000
FACSIMILE (314) 259-2020

LONDON, ENGLAND
DUBAI, SAUDI ARABIA
KUNING CITY, HUNAN
ABU DHABI, UNITED ARAB EMIRATES
DUBAI, UNITED ARAB EMIRATES
HONG KONG
ASSOCIATED OFFICE IN SHANGHAI

(314) 259-2001

May 13, 1997

VIA FACSIMILE ((202) 219-3923) AND REGULAR MAIL

F. Andrew Turley, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

RE: MUR 4631 (Response of John W. Lemkemeier)

Dear Mr. Turley:

This letter is in response to your letter dated April 28, 1997, notifying me of a complaint sent to you by Edward Dyck. Mr. Dyck apparently alleges that I and others committed wrongdoing in connection with reports filed by Perot '92 with the Federal Election Commission ("FEC"). This complaint is very similar to the complaint filed by Mr. Dyck in January 1997 (MUR 4541) alleging that I and others committed wrongdoing in connection with a report filed by the Perot Reform Committee, Inc. ("PRC") with the FEC. My response to that complaint is attached hereto.

Mr. Dyck's allegations against me in these complaints have absolutely no basis. I have never represented or had any involvement with Perot '92 or the PRC. I had no knowledge before Mr. Dyck brought these complaints that Perot '92 or the PRC had filed with the FEC the reports he references. I have never filed any report with the FEC, have never made representations to the FEC of any kind, and have never represented a client in any proceeding before the FEC.

Mr. Dyck has named me in these complaints because, when I was an associate at Kohn, Shands, Elbert, Gianoulakis & Giljum in St. Louis, I participated in representing Sandra McClure in litigation he brought against her. I have since left that firm and no longer represent Ms. McClure. These complaints are simply harassment and should be dismissed.

Sincerely,

John W. Lemkemeier
John W. Lemkemeier

MAY 13 4 45 PM '97

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COMMISSION
OFFICE OF GENERAL
COUNSEL

9 8 0 4 3 8 6 3 1 7 1

WASHINGTON, D.C.
NEW YORK, NEW YORK
KANSAS CITY, MISSOURI
OVERLAND PARK, KANSAS
PHOENIX, ARIZONA
LOS ANGELES, CALIFORNIA
SANTA MONICA, CALIFORNIA
IRVINE, CALIFORNIA
JOHN W. LEMKEMEIER

BRYAN CAVE LLP

ONE METROPOLITAN SQUARE
211 N. BROADWAY, SUITE 3000
ST. LOUIS, MISSOURI 63102-2780
(314) 259-2000
FACSIMILE: (314) 259-2020

LONDON, ENGLAND
RYYAN, SAUDI ARABIA
DUBAI CITY, U.A.E.
ABU DHABI, UNITED ARAB EMIRATES
DUBAI, UNITED ARAB EMIRATES
HONG KONG
ASSOCIATED OFFICE IN SHANGHAI

February 21, 1997

VIA FACSIMILE ((202) 219-3923) AND REGULAR MAIL

F. Andrew Turley, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

RE: MUR 4541 (Response of John W. Lemkemeier)

Dear Mr. Turley:

This letter is in response to your letter dated February 7, 1997, notifying me of the complaint and amended complaint sent to you by Edward Dyck. Mr. Dyck apparently alleges that I committed wrongdoing in connection with a report filed with the Federal Election Commission ("FEC") by the Perot Reform Committee, Inc. ("PRC") stating that PRC had paid \$8,223.26 to Sandra McClure for consulting services.

Mr. Dyck and Ms. McClure were volunteers for Ross Perot's 1992 petition drive in Missouri. In 1994, Mr. Dyck sued Ms. McClure and many other parties in federal court in Missouri over certain alleged events relating to the Missouri petition drive. On information and belief, the claims against Ms. McClure are currently the subject of a summary judgment motion filed by Ms. McClure.

Ms. McClure is represented in this litigation by the law firm of Kohn, Shands, Elbert, Giannoulakis & Gajura, LLP ("Kohn Shands"). From August 1995 until November 1996, while I was an associate at Kohn Shands, I worked with Alan Kohn on Ms. McClure's defense in this litigation. In November 1996, I left Kohn Shands to pursue a different type of practice at a different law firm and ceased representing Ms. McClure at that time.

ATTACHMENT

Page 1 of 2

98043863172

BRYAN CAVE LLP

February 21, 1997

Page 2

Mr. Dyck's allegation against me in connection with the FEC report filed by the PRC has absolutely no basis. I have never represented or had any involvement with the PRC, and had no knowledge (until Mr. Dyck filed this FEC complaint) that the PRC had filed this report with the FEC. I have never filed any report with the FEC or made representations to the FEC of any kind. During the period in which I participated in the representation of Ms. McClure as an associate at Kohn Shands, Ms. McClure to my knowledge never filed any report with the FEC or made representations to the FEC of any kind.

Mr. Dyck's attack in his FEC complaint against the lawyers who have participated in the defense of parties he has sued is a transparent attempt at harassment. His allegations against me are offensive and, for the reasons stated, wholly without merit. I ask that they be dismissed.

Please contact me at 314/259-2000 with any questions regarding the foregoing.

Sincerely,

John W. Lemkemeier
John W. Lemkemeier

ATTACHMENT
Page 2 of 2

HUGHES & LUCE, L.L.P.

Attorneys and Counselors

RECEIVED 1717 Main Street
FEDERAL ELECTION COMMISSION
Suite 2800
Dallas, Texas 75201
214 / 939-8800
MAY 13 9 26 AM '97
214 / 939-6100 (fax)

May 12, 1997

Writer's Direct Dial Number

214/939-5416
MULFORC@hughesluce.com

Other Offices

Austin
Houston

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

Attn: F. Andrew Turley

RE: MUR 4631

Dear Mr. Turley:

This letter is in response to your letter dated April 28, 1997, received on May 2, 1997, with respect to statements made by Mr. Edward I. Dyck concerning Mike Poss and The Perot Group in 1992.

As you are aware, Mr. Dyck has filed numerous FEC complaints and legal actions against Ross Perot and his political campaigns and those affiliated with them. In this instance, it appears the FEC seeks the response of The Perot Group to the notation by Mr. Dyck that Mike Poss was employed in 1992 by The Perot Group. (I have attached a copy of the affidavit from Mike Poss to that effect submitted in response to one of Mr. Dyck's many complaints, MUR 3963.) Please be advised that Mike Poss was and is employed by The Perot Group, a sole proprietorship of Ross Perot, and that payroll compensation and benefits paid to him were properly included on the reports filed with the Commission by the Perot 1992 presidential campaign as in-kind contributions of services of individuals by Ross Perot. The amount of the in-kind contributions varied by the apportionment of Mr. Poss' time to campaign and non-campaign duties, but was generally 100% in the months at issue to Mr. Dyck. In other words, payments to Mike Poss were duly reported in proper amount as in-kind contributions of services of employees by Ross Perot (and in-kind expenditures in compliance with the proper methods of reporting in-kind receipts and disbursements) in compliance with FEC rules and regulations.

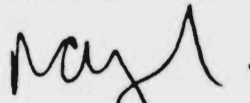
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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

May 12, 1997

Page 2

If you have any further questions regarding the foregoing, please do not hesitate to contact me.

Very truly yours,



Ross Clayton Mulford

RCM:rm

Attachments - June 21, 1994 Affidavit of Mike Poss re: MUR 4631

- Designation of Counsel

98043063175

AFFIDAVIT OF MIKE POSS

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

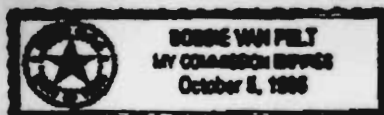
I, MIKE POSS, being duly sworn, depose and say:

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



STATEMENT OF DESIGNATION OF COUNSEL

MUR 4631

NAME OF COUNSEL: R. Clayton Mulford

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

ADDRESS: 1717 Main Street, Suite 2800

Dallas, Texas 75201

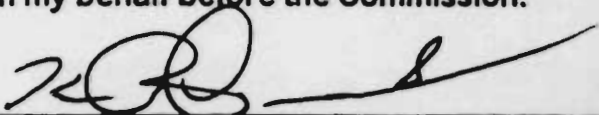
TELEPHONE: (214) 939-5416

FAX: (214) 939-6100

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.

5-12-97

Date



Signature

RESPONDENT'S NAME: Ross Perot/The Perot Group

ADDRESS: 1700 Lakeside Square

12377 Merit Drive

Dallas, Texas 75251

TELEPHONE: HOME()

BUSINESS(972) 788-3000

980043863177

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4631

NAME OF COUNSEL: Alan C. Kohn

FIRM: Kohn, Shands, Elbert, Gianoulakis & Giljum, LLP

ADDRESS: One Mercantile Center
24th Floor

St. Louis, MO 63101

TELEPHONE: (314) 241-3963

FAX: (314) 241-2509

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.

5/04/1997
Date

Sandra Stone McClure
Signature

MAY 1 12 25 PM '97

RESPONDENT'S NAME: Sandra Stone McClure

ADDRESS: 7439 East Farm Road 170
Rogersville, MO 65742

TELEPHONE: HOME

BUSINESS()

98043863178

KOHN, SHANDS, ELBERT, GIANOULAKIS & GILJUM, LLP

ATTORNEYS AT LAW

ONE MERCANTILE CENTER, 24TH FLOOR

ST. LOUIS, MISSOURI 63101

ALAN C. KOHN
COURTNEY SHANDS, JR.
HAROLD I. ELBERT
JOHN GIANOULAKIS
JOSEPH P. GILJUM
JOHN A. KLODASA
MARK J. BRUNER
CHARLES S. ELBERT
ROBERT T. MAAS
ROBERT A. UNTERD
PETER WOODS
LISA A. PARR
LOUI J. BARRING

ROBERT F. MURRAY
SUSAN E. BINDLER
DAVID A. CASTLEMAN
BECKY L. HUINKER

(314) 241-0000
TELESCOPIER (314) 241-0000

May 15, 1997

VIA FAX AND FEDERAL EXPRESS

Mr. F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: Response on Behalf of Sandra S. McClure and
Her Attorney, Alan C. Kohn
MUR 4631

Dear Mr. Turley:

I submit this response on behalf of Sandra S. McClure and myself, Alan Kohn, in the above-referenced complaint filed by Edward Dyck. I enclose a copy of Mrs. McClure's designation of me as her counsel. The original was mailed directly to you by Mrs. McClure. This is the third response we have filed with the Commission regarding Ed Dyck's baseless allegations. The first two responses pertained to MUR 4541.

1. On May 17, 1996, the Perot Reform Committee properly disbursed \$8,223.26 to Sandy McClure for consulting fees. By letter dated October 25, 1996, Edward Dyck (FEC File MUR 4541) filed a Complaint with the FEC alleging, without any foundation whatsoever, that the money was paid to me to represent her in meritless litigation filed by Mr. Dyck in federal court in St. Louis. That litigation is under submission on a Motion for Summary Judgment filed by the Defendants, including Mrs. McClure. In his FEC Complaint, Mr. Dyck admitted he had no basis for his

MAY 16 2 04 PM '97

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OFFICE OF GENERAL
COUNSEL

9 8 0 4 3 6 1 7 2

Mr. F. Andrew Turley
May 15, 1997
Page 2

FEC allegations but asked the FEC to "please verify this [his complaint] for me".

2. On December 12, 1996, Ross Perot, the Perot Reform Committee (PRC) and Perot '96 responded to the Complaint. The response pointed out the background for Mr. Dyck's allegations and enclosed documentary evidence proving that the PRC paid \$8,223.26 to Mrs. McClure for time and expenses and properly reported that item to the FEC. That money was not paid to me.

3. By letter dated December 15, 1996, I, on behalf of Mrs. McClure, also responded to the Complaint in which I pointed out that the Complaint is pure harassment and that Mrs. McClure has no reporting obligations to the FEC and, hence, the FEC lacks jurisdiction over her.

4. On February 7, 1997, Mr. Dyck filed a "supplement" to his Complaint which was a hodge-podge of irrelevancies which in no way detracted from the responses of December 12 and 15 and which added me and my young associate, John Lemkemeier, among others, to the list of persons about whom Mr. Dyck was complaining.

5. By letters dated February 20 and 21, I and Mr. Lemkemeier, as well as Ms. Kim Askew on behalf of the PRC, herself and others, pointed out the emptiness of Mr. Dyck's allegations.

6. Now Mr. Dyck has filed his Second FEC Complaint which has been given a new number (MUR 4631), but which contains essentially nothing new. At best, it shows that Perot '92 properly reported that it paid my law firm legal fees at various times between May 1, 1995 and December 28, 1995. These payments violate no law and do not establish any jurisdiction over Mrs. McClure, me, Mr. Lemkemeier or my law firm.

For the reasons stated above and in my other responses above noted, I ask that both Complaints be dismissed forthwith and that this harassment be brought to a halt.

Mr. F. Andrew Turley
May 15, 1997
Page 3

KOHN, SHANDS, ELBERT,
GIANOULAKIS & GILJUM, LLP.

A handwritten signature in dark ink, appearing to read 'ACK', is written over a horizontal line.

Alan C. Kohn
One Mercantile Center
Suite 2410
St. Louis, MO 63101
(314) 241-3963
(314) 241-2509

9804366181

WASHINGTON, D.C.
NEW YORK, NEW YORK
KANSAS CITY, MISSOURI
OVERLAND PARK, KANSAS
PHOENIX, ARIZONA
LOS ANGELES, CALIFORNIA
SANTA MONICA, CALIFORNIA
IRVINE, CALIFORNIA
JOHN W. LEMKEMEIER

BRYAN CAVE LLP
ONE METROPOLITAN SQUARE
211 N. BROADWAY, SUITE 3600
ST. LOUIS, MISSOURI 63102-2750
(314) 259-2000
FACSIMILE: (314) 259-2020

LONDON, ENGLAND
RIYADH, SAUDI ARABIA
KUWAIT CITY, KUWAIT
ABU DHABI, UNITED ARAB EMIRATES
DUBAI, UNITED ARAB EMIRATES
HONG KONG
ASSOCIATED OFFICE IN SHANGHAI

(314) 259-2681

May 13, 1997

VIA FACSIMILE ((202) 219-3923) AND REGULAR MAIL

F. Andrew Turley, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

MAY 19 10 14 AM '97
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

RE: MUR 4631 (Response of John W. Lemkemeier)

Dear Mr. Turley:

This letter is in response to your letter dated April 28, 1997, notifying me of a complaint sent to you by Edward Dyck. Mr. Dyck apparently alleges that I and others committed wrongdoing in connection with reports filed by Perot '92 with the Federal Election Commission ("FEC"). This complaint is very similar to the complaint filed by Mr. Dyck in January 1997 (MUR 4541) alleging that I and others committed wrongdoing in connection with a report filed by the Perot Reform Committee, Inc. ("PRC") with the FEC. My response to that complaint is attached hereto.

Mr. Dyck's allegations against me in these complaints have absolutely no basis. I have never represented or had any involvement with Perot '92 or the PRC. I had no knowledge before Mr. Dyck brought these complaints that Perot '92 or the PRC had filed with the FEC the reports he references. I have never filed any report with the FEC, have never made representations to the FEC of any kind, and have never represented a client in any proceeding before the FEC.

Mr. Dyck has named me in these complaints because, when I was an associate at Kohn, Shands, Elbert, Gianoulakis & Giljum in St. Louis, I participated in representing Sandra McClure in litigation he brought against her. I have since left that firm and no longer represent Ms. McClure. These complaints are simply harassment and should be dismissed.

Sincerely,

John W. Lemkemeier
John W. Lemkemeier

WASHINGTON, D.C.
NEW YORK, NEW YORK
KANSAS CITY, MISSOURI
OVERLAND PARK, KANSAS
PHOENIX, ARIZONA
LOS ANGELES, CALIFORNIA
SANTA MONICA, CALIFORNIA
IRVINE, CALIFORNIA
JOHN W. LEMKEMEIER

BRYAN CAVE LLP

ONE METROPOLITAN SQUARE
211 N. BROADWAY, SUITE 3000
ST. LOUIS, MISSOURI 63102-2750
(314) 259-2000
FACSIMILE: (314) 259-2020

LONDON, ENGLAND
RIYADH, SAUDI ARABIA
KUWAIT CITY, KUWAIT
ABU DHABI, UNITED ARAB EMIRATES
DUBAI, UNITED ARAB EMIRATES
HONG KONG
ASSOCIATED OFFICE IN SHANGHAI

February 21, 1997

VIA FACSIMILE ((202) 219-3923) AND REGULAR MAIL

F. Andrew Turley, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

RE: MUR 4541 (Response of John W. Lemkemeier)

Dear Mr. Turley:

This letter is in response to your letter dated February 7, 1997, notifying me of the complaint and amended complaint sent to you by Edward Dyck. Mr. Dyck apparently alleges that I committed wrongdoing in connection with a report filed with the Federal Election Commission ("FEC") by the Perot Reform Committee, Inc. ("PRC") stating that PRC had paid \$8,223.26 to Sandra McClure for consulting services.

Mr. Dyck and Ms. McClure were volunteers for Ross Perot's 1992 petition drive in Missouri. In 1994, Mr. Dyck sued Ms. McClure and many other parties in federal court in Missouri over certain alleged events relating to the Missouri petition drive. On information and belief, the claims against Ms. McClure are currently the subject of a summary judgment motion filed by Ms. McClure.

Ms. McClure is represented in this litigation by the law firm of Kohn, Shands, Elbert, Gianoulakis & Giljum, LLP ("Kohn Shands"). From August 1995 until November 1996, while I was an associate at Kohn Shands, I worked with Alan Kohn on Ms. McClure's defense in this litigation. In November 1996, I left Kohn Shands to pursue a different type of practice at a different law firm and ceased representing Ms. McClure at that time.

ATTACHMENT

Page 1 of 2

February 21, 1997

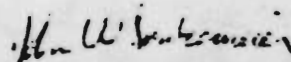
Page 2

Mr. Dyck's allegation against me in connection with the FEC report filed by the PRC has absolutely no basis. I have never represented or had any involvement with the PRC, and had no knowledge (until Mr. Dyck filed this FEC complaint) that the PRC had filed this report with the FEC. I have never filed any report with the FEC or made representations to the FEC of any kind. During the period in which I participated in the representation of Ms. McClure as an associate at Kohn Shands, Ms. McClure to my knowledge never filed any report with the FEC or made representations to the FEC of any kind.

Mr. Dyck's attack in his FEC complaint against the lawyers who have participated in the defense of parties he has sued is a transparent attempt at harassment. His allegations against me are offensive and, for the reasons stated, wholly without merit. I ask that they be dismissed.

Please contact me at 314/259-2000 with any questions regarding the foregoing.

Sincerely,


John W. Lemkemeier

9 8 0 4 3 3 6 3 1 8 4

August 29, 1997

Edward Dyck
253 Heather Crest Drive
Chesterfield, MO 63017

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

SUBJECT: Amendment to MUR #4631--additional evidence

Dear Sir:

I wish to make the following amendment to MUR #4631: Additional/supplemental evidence directly relating to this matter of "funneling money" by Ross Perot through the FEC and "kickbacks" from Ross Perot to Sandra McClure through the FEC (both violations of CFR 11) can be found in the computer files of Ross Perot and the lawfirm of Hughes & Luce in Dallas. Your request should specifically ask for all files with the prefix numbers 30600270 1 through 30600270.9999 (these numbers are located at the bottom left or right of the page--see inclosed exhibits with code numbers circled) for the dates February 1, 1992 through November 9, 1996. The lawyers at Hughes & Luce lawfirm controlling these files were Mr. Tom Luce (Partner of the firm and head of The Perot Petition Committee), Mr. Clay Mulford (General Counsel for The Perot Petition Committee), and Ms. Kim Askew (Mr. Mulford's Assistant). Mr. Ross Perot, Mr. Mike Poss (Treasurer of the Perot Petition Committee) and Ms. Sandra McClure (The Perot Petition Committee Agent in Missouri) all posses pieces of this file.

The requests should be directed to:

Mr. Tom Luce
Hughes & Luce, L.L.P.
1717 Main Street
Suite 2800
Dallas, Texas 730836
214-939-5500 fax 214-939-6100 telex 730836

Mr. Ross Perot
1044 Strait Lane
Dallas, Texas 75251
214-788-3000 (O)

Mr. James Michael Poss
6405 Mercedes Avenue
Dallas, Texas 75214
1-800-96-PARTY

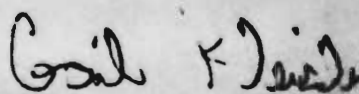
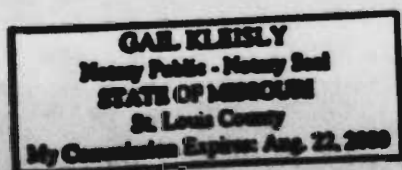
Ms. Sandra Stone McClure
7439 East Farm Road, 1-70
Rogersville, Missouri 65742

Very sincerely yours,



Exhibits enclosed with portions of these files. code numbers are circled

Subscribed and sworn before me this 22nd of August, 1997.



98043863186

SUMMARY OF HUGHES & LUCE DOCUMENTS FROM THE LAW FIRM'S FILE #30600270

Hughes & Luce Matter Number	Exhibit No.	Description of Document
30600270.3	#1	Ross Perot Stationery to FEC forming the PPC (dated 03/20/92)
30600270.26	#2	Hughes & Luce FAX Document sent by Ethan Knowlden to Kevin Laughlin regarding Missouri petition to put Ross Perot on Missouri Presidential ballot (dated 03/24/92)
30600270.40.2	#3	Hughes & Luce Stationery, Ross Clayton Mulford to FEC filing FEC Form 1 (dated 03/27/92)
30600270.53	#4	Perot Petition Committee Document, Coordinator's Contribution and Expenditure Guidelines (dated 04/07/92)
30600270.66	#5	Perot Petition Committee Memorandum to State Coordinators regarding Campaign Finance Procedures (dated 04/07/92)
30600270.84 & .85	#6	Ross Perot Stationery to PPC designating under FEC regs. additional authorized committees (dated 04/14/92)
30600270.90.1 (.88 & .88)	#7	Perot Petition Committee Stationery, Mike Poss to FEC amending Statement of Organization (FEC Form 1) (dated 04/17/92)
30600270.90.3	#8	Hughes & Luce Stationery, Ross Clayton Mulford to FEC regarding PPC letter 30600270.90.1 amending Statement of Organization (dated 04/17/92)
30600270.90.5	#9	Hughes & Luce Stationery - Ross Clayton Mulford to the FEC with PPC letter from Mike Poss amending Statement of Organization to include additional banks and depositories in various states including Missouri (dated 05/13/92)

9 8 0 4 3 8 6 3 1 8 8

30600270.96	#10	Hughes & Luce Stationery - Ethan Knowlden to Commerce Bank of St. Louis (James Swarts) describing how the firm represents the PPC and how the PPC operates in Missouri under the name of Missouri for Perot and that Kevin Laughlin is the state coordinator for the PPC (date 04/21/92)
30600270.116	#11	Hughes & Luce Withdrawal of Presidential Elector Form for Missouri (no date)
30600270.116	#12	Hughes & Luce Withdrawal of Presidential Elector Form for Missouri (no date) with Sandra McClure's handwritten note saying the original form was sent from Dallas and the notation is initialed by McClure (no date)
30600270.116	#13	Hughes & Luce Oath and Certificate of Missouri Presidential Elector Form for Mark J. Dotzler, Jr.(no date)
30600270.116	#14	Hughes & Luce Oath and Certificate of Missouri Presidential Elector for Edward L Dyck <u>notarized</u> (dated 05/06/92)
30600270.153	#15	Ross Perot's Declaration of Candidacy for President of the United States sent to Roy Blunt Missouri Secy. of State pursuant to Section 115.321 of the Missouri Election Laws (produced by the PPC) (dated 06/05/92)
30600270.153	#16	Ross Perot's Declaration of Candidacy for President of the United States sent to Roy Blunt Missouri Secy. of State pursuant to Section 115.321 of the Missouri Election Laws (MO Secy. of State date stamp) (dated 06/05/92)
30600270.160.1	#17	Ross Perot Sworn Document, Consent of Presidential Candidate (dated 06/05/92)
30600270.339	#18	Ross Perot Stationery to West Virginia's Secy. of State, Ken Hechler, certifying WV Presidential Electors and VP running mate (dated 08/03/92)
30600270.343	#19	Ross Perot Stationery to Nevada's Secy. of State, Cheryl Lau, designating his candidates for Presidential Electors (dated 08/12/92)
30600270.448	#20	Perot Petition Committee Employment Affidavit of Joe Grant (dated 06/21/94)

30600270.449

#21

Perot Petition Committee Employment Affidavit
of Michelle Grant (dated 06/21/94)

30600270.450

#22

Perot Petition Committee Employment Affidavit
of Russ Melbye (dated 06/22/94)

98043863189

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

March 20, 1992

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

Ladies and Gentlemen:

I do not consider myself a candidate for the office of President of the United States. Depending upon the results of volunteer efforts to place my name on the ballot in 50 States, however, I may become a candidate for the Presidency. I have been advised that under rules of the Federal Election Commission at 11 CFR §100.3, I may be deemed to fall within the technical definition of a "candidate", requiring that I make certain filings. I also understand that I must designate or form a "principal campaign committee" in connection with this designation. Therefore, for purposes of ensuring full compliance with 11 CFR §101.1 and related statutes and regulations, I file this letter in lieu of FEC Form 2, and submit the following required information:

- | | |
|---|--|
| 1. Name and Address: | Ross Perot
1700 Lakeside Square
12377 Merit Drive
Dallas, Texas 75251 |
| 2. Identification No: | Not Applicable |
| 3. Party Affiliation: | None/Independent |
| 4. Office: | President |
| 5. State and District of Candidate: | Not Applicable |
| 6. Designation of Principal Campaign Committee for the 1992 Election: | Perot Petition Committee
1100 Lakeside Square
12377 Merit Drive
Dallas, Texas 75251 |
| 7. Designation of other authorized committees: | None |

I hereby certify that to the best of my knowledge and belief this information is true, correct and complete.

Very truly yours,



Ross Perot



30600270.3

RA-16

98043863190

3-20-92

MISSOURI

Required Signatures: 25,000 (certain geographical restrictions - see below)

Target Signatures: 30,000

Petition Deadline: August 3

Petition Signer Requirements: Registered to vote in Missouri; petitions must be circulated by county; must obtain 1% from each of all congressional districts or 2% each from any 5 districts

Petition Circulator Requirements: Resident of and registered to vote in Missouri

Signature Verification: Verified by Secretary of State after submission by candidate

V.P. Requirements: June 3 (required on petitions; assumes 60 days required to obtain target amount)

Candidate Authorization Requirements: August 3

Electoral College State: Must appear on petitions; no party registration in Missouri

Electoral Votes: 11

Other Information: ---

For Legal Inquiries Contact:

EXHIBIT

1 2

98043863192

HUGHES & LUCE, L.L.P.

1717 MAIN STREET
SUITE 2800
DALLAS, TEXAS 75201
(214) 939-5416
FAX (214) 939-8430
TELEX 730836

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

MAR 30 10 04 AM '92

HOUSTON TEXAS 77002
(713) 784-9100
FAX (713) 784-9200

CONVICTED
S. T. 100
AUSTIN, TEXAS 78701
(512) 462-9000
FAX (512) 462-1000

Direct Dial Number
(214) 939-5416

March 27, 1992

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

Dear Sir or Madam:

Enclosed please find FEC Form 1 from the Perot Petition Committee in accordance with 11 CFR §101.1 and related regulatory provisions.

If you have any questions or comments concerning this filing, please contact me at (214) 939-5416.

Very truly yours,

R. Clayton Malford

Ross Clayton Malford

RCM/mfh
enclosure

30600270.40.2

EXHIBIT

3

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

RECEIVED
FEDERAL ELECTION
COMMISSION

1. (a) NAME OF COMMITTEE IN FULL
PEROT PETITION COMMITTEE

(Check if name is changed)

2. DATE
MARCH 25, 1992

(b) Number and Street Address

(Check if address is changed)

1700 LAKESIDE SQUARE, 12377 MERIT DRIVE

3. FEC IDENTIFICATION NUMBER

MAR 30 10 04 AM '92

(c) City, State and ZIP Code

DALLAS, TEXAS 75251

4. IS THIS STATEMENT AN AMENDMENT?

☐ YES ☒ NO

5. TYPE OF COMMITTEE (Check one)

☒ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State District
ROSS PEROT	INDEPENDENT	PRESIDENT	TEXAS

☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
N/A		

Type of Connected Organization

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
MIKE POSS	1700 Lakeside Square 12377 Merit Drive Dallas, TX 75251	TREASURER

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
MIKE POSS	1700 Lakeside Square 12377 Merit Drive Dallas, TX 75251	TREASURER
RUSS MONROE	(same)	ASSISTANT TREASURER

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
NATIONS BANK	P. O. BOX 830301 DALLAS, TX 75238-0301

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

TYPE OR PRINT NAME OF TREASURER

SIGNATURE OF TREASURER

Mike Poss

Mike Poss

DATE

3-25-92

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
Federal Election Commission
Toll-free 800-424-9630
Local 202-376-3120

FEC FORM 1
(Revised 4-87)

92037440318

98043863195

PEROT PETITION COMMITTEE COORDINATORS' CONTRIBUTION AND EXPENDITURE GUIDELINES

CONTRIBUTIONS

1. Contributions made by corporations, labor organizations or banks are illegal and cannot be accepted. For example, a dentist who is a "PC" - professional corporation - cannot make a contribution drawn on his "PC" account, and the owner of an incorporated "mom and pop" grocery store may not use its business account to make contributions.
2. The prohibition against corporate contributions includes in-kind contributions such as the use of telephones, typewriters, office furniture, stamps, or copy machines owned by a corporation, labor organization, or bank.
3. You may use the facilities of a corporation, labor organization, or bank if you pay the normal and usual rental charge, and may use the space without charge if the corporation has a policy to allow such use free of charge, has done so before and provides the space on a non-partisan basis.
4. Contributions by Federal Government contractors or foreign nationals are illegal.
5. Individuals or partnerships may contribute, in the aggregate, a maximum of \$1,000. This applies to monetary and in-kind contributions (donations of goods and services) valued at market value.
6. Partnership contributions are allocated proportionately among partners - reducing the amount they may contribute as individuals. For example, if a 3 person partnership gives the maximum \$1,000, those 3 partners are each limited to an additional maximum contribution of \$667 ($\$1,000 - (\$1,000 \text{ divided by } 3)$).
7. Cash contributions over \$100 may not be accepted.
8. An individual may volunteer personal services to your organization without making a contribution as long as the individual is not compensated by anyone (including the volunteer's employer) for the services provided.
9. The entire amount paid to attend a fund raiser or to purchase a fund raising item is a contribution. For example, if a contributor spends \$20 to buy a campaign tee shirt that costs the campaign \$5, the contributor has made a \$20 contribution.
10. All advertisements (except buttons, bumper stickers and other small items) must state "authorized and paid for by Perot Petition Committee" (or identify whoever else has paid for the item).
11. Solicitations for contributions made in print, by television or radio, or by telephone must state "Contributions are not deductible as charitable contributions for Federal income tax purposes."

RECORDKEEPING

1. Records of contributions - including in-kind contributions - must be maintained identifying each contribution by amount, date of receipt, donor's full name and address, occupation and employer.
2. Contributions must be deposited into an authorized bank account (or returned) within 10 days of receipt. Maintain all bank records.
3. Records of small contributions (less than \$50 each) collected at a fund raiser (such as gate receipts and cash contributions) must include only the name of the event, the date of receipt and the total amount of contributions received on each day of the event.
4. An anonymous cash contribution may not exceed \$50 in the aggregate per individual.
5. Records for all expenditures, including purpose, date, amount, and payee name and address must be maintained.
6. A written record of petty cash disbursements must be kept if a petty cash fund is maintained. Payments from petty cash to one person for any one purchase or transaction may not exceed \$100.

98043863197

Perot Petition
1100 Lakeside Square
12377 Merit Drive
Dallas, Texas 75251

April 14, 1992


Perot Petition Committee
1100 Lakeside Square
12377 Merit Drive
Dallas, Texas 75251

Ladies and Gentlemen:

In your capacity as the "principal campaign committee" which I was required to designate under Federal Election Commission regulations, please be advised that the committees listed on Attachment A to this letter are hereby designated as additional authorized committees.

This letter is delivered to you in lieu of FEC Form 2 in accordance with 11 CFR §§ 101.1(b) and 102.13.

Very truly yours,


Ross Perot

ATTACHMENT A

Perot Petition Committee
26 Navarre
Irvine, California 92715

Draft Perot Committee
325 Epping Way
Annapolis, Maryland 21401

The Perot Petition/Campaign Committee
Royce Hotel
31500 Wick Road, Suite 342 and 442
Romulus, Michigan 48174

9 0 0 4 3 0 6 3 1 9 9
9 2 ~ 3 7 4 4 4 9 0 4

98043863200

PEROT PETITION COMMITTEE
12377 Merit Drive
1100 Lakeside Square
Dallas, Texas 75251

April 17, 1992

VIA FEDERAL EXPRESS

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

Re: Perot Petition Committee (FEC Identification No. C00263145)

Ladies and Gentlemen:

Pursuant to 11 C.F.R. §102.2, this letter is filed to amend our Statement of Organization, originally dated March 25, 1992, as follows:

- (1) The committees listed on Exhibit A attached hereto have been designated by the "candidate" as additional authorized committees. Therefore, Item 6 of our Statement of Organization is hereby amended in accordance with 11 C.F.R. §§101.1, 102.2 and 104.3 to include such committees as affiliated committees. Included with Exhibit A is (a) the candidate's letter designating the committees, filed with the Perot Petition Committee in accordance with 11 C.F.R. §§101.1 and 102.13 on April 14, 1992, and (b) amended FEC Forms 1 for each of such committees, filed with the Perot Petition Committee in accordance with 11 C.F.R. §§101.1, 102.1, 102.2 and 104.3.
- (2) Item 9 of our Statement of Organization is hereby amended in accordance with 11 C.F.R. §§101.1, 102.2, 103.1 and 103.2 to include those banks or other depositories listed on Exhibit B attached hereto as additional banks or other depositories in which the Perot Petition Committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

I certify that I have examined this letter and to the best of my knowledge and belief it is true, correct and complete. Please call me at (214) 788-3030 with any questions or comments you may have.

Very truly yours,

Perot Petition Committee

By:

Mike Poss
Mike Poss, Treasurer

92043863201

SECRET

Perot Petition Committee
26 Navarre
Irvine, California 92715

Draft Perot Committee
325 Epping Way
Annapolis, Maryland 21401

The Perot Petition/Campaign Committee
Royce Hotel
31500 Wick Road, Suite 342 and 442
Romulus, Michigan 48174

000043863202

92737444980

Cornerstone Bank
P.O. Box 326
Derry, NH 03038

Sunwest Bank of Santa Fe
P.O. Box 5373
Santa Fe, NM 87502-5373

Chemical Bank
1 East 41st Street
New York, NY 10017

Local America Bank
P.O. Box 3499
Tulsa, OK 74101

Mellon Bank
22 Turner Lane
West Goshen, PA 19382

First Security Bank of Utah, N.A.
230 S. Main
Bountiful, UT 84010

Nations Bank of Virginia, N.A.
12th and Main Streets
Richmond, VA 23219-3909

Seattle First National (Seafirst Bank)
Renton Hills Branch
1649 Duvall Ave. NE
Renton, WA 98059

Norwest Bank
735 W. Wisconsin Avenue
Milwaukee, WI 53223

First Interstate Bank of Wyoming
P.O. Box 233
Riverton, WY 82501

98043863200
9203744982

EXHIBIT 1

First Alabama Bank
P.O. Box 511
Montgomery, AL 36134

Bank of America
6080 East Thomas Road
Scottsdale, AZ 85251

First Interstate Bank of California
1 Civic Plaza, Suite 200
Newport Beach, CA 92660

Women's Bank
821 17th Street
P.O. Box 8779
Denver, CO 80201

Bank of the South, N.A.
135 Perimeter Center West
Atlanta, GA 30346

Premier Bank
3554 South Sherwood Forest Blvd.
P.O. Box 3399
Baton Rouge, LA 70821-3399

Annapolis Bank and Trust
921 Bay Ridge Avenue
Annapolis, MD 21403

Bay Bank Boston, N.A.
5 Tremont Street
Boston, MA 02108

Peoples Heritage Bank
299 Elm Street
Biddeford, ME 04005

National Bank of Detroit
Branch #135
2410 West Road
Trenton, MI 48183

Union Bank & Trust Company
P.O. Box 6155
3643 South 48th Street
Lincoln, NE 68506

First Interstate Bank of Nevada
California/Arlington Office
490 California Avenue
Reno, NV 89509

9 2 0 3 7 4 4 4 9 8 1

HUGHES & LUCE, L.L.P.
A REGISTERED LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATION

1717 MAIN STREET
SUITE 2800
DALLAS, TEXAS 75201
(214) 939-8800
FAX (214) 939-8100
TELEX 730636

RECEIVED
FEDERAL ELECTION COMMISSION
JAN 10 1992

11 CONGRESS AVENUE
SUITE 800
AUSTIN, TEXAS 78701
(512) 462-6000
FAX (512) 462-6055

1717 MAIN STREET
SUITE 2800
DALLAS, TEXAS 75201
(214) 939-8800
FAX (214) 939-8100

Direct Dial Number
(214) 939-5416

April 17, 1992

VIA FEDERAL EXPRESS

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

Re: Perot Petition Committee (FEC Identification No. C00263145)

Ladies and Gentlemen:

Pursuant to 11 C.F.R. §102.2, enclosed please find a letter in lieu of FEC Form 1, which amends the Statement of Organization, originally dated March 25, 1992, of the Perot Petition Committee.

Please file stamp the enclosed additional copy of this letter with attachments and return it to me in the enclosed envelope.

Please call me at the number listed above with any questions or comments. Thank you for your assistance.

Very truly yours,

R. Clayton Mulford
Ross Clayton Mulford

RCM/mfh
enclosure

30600270.96.3

EXHIBIT

1 8

HUGHES & LUCHE, L.L.P.
REGISTERED UNITED STATES PATENT AND TRADEMARK OFFICE
INCLUSIVE PROFESSIONAL CORPORATION

1717 MAIN STREET
SUITE 2800
DALLAS, TEXAS 75201
(214) 939-8800
FAX (214) 939-8400
TELEX 730836

RECEIVED
FEDERAL ELECTION
COMMISSION
MAY 14 1992

May 14 12:26 PM '92

108 MAIN STREET
SUITE 1300
HOUSTON, TEXAS 77002
(713) 784-8200
FAX (713) 784-8208

1100 CONGRESS AVENUE
SUITE 800
AUSTIN, TEXAS 78701
(512) 482-8800
FAX (512) 482-8801

Direct Dial Number
(214) 716-4681

May 13, 1992

VIA FEDERAL EXPRESS

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

Re: Perot Petition Committee (FEC Identification No. C00263145)

Ladies and Gentlemen:

Pursuant to 11 C.F.R. §102.2, enclosed please find a letter in lieu of FEC Form 1, which amends the Statement of Organization, originally dated March 25, 1992, of the Perot Petition Committee.

Please file stamp the enclosed additional copy of this letter with attachments and return it to me in the enclosed Federal Express envelope.

Please call me at the number listed above with any questions or comments. Thank you for your assistance.

Very truly yours,

R. Clayton Mulford
Ross Clayton Mulford

RCM/mfh
enclosure

20400270-90.5

EXHIBIT

9892438230290262

PEROT PETITION COMMITTEE
P.O. Box 517026
Dallas, Texas 75251-7026
Telephone (214) 788-3030

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
MAY 14 12 25 PM '92

May 13, 1992

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

Re: Perot Petition Committee (FEC Identification
No.C00263145)

Ladies and Gentlemen:

Pursuant to 11 C.F.R.§102.2, this letter is filed to amend our
Statement of Organization, originally dated March 25, 1992, as follows:

Item 9 of our Statement of Organization is hereby amended in
accordance with 11 C.F.R. §§101.1, 102.2, and 109.2 to include
those banks or other depositories listed on Exhibit A hereto
as additional banks or other depositories in which the Perot
Petition Committee deposits funds, holds accounts, rents
safety deposit boxes or maintains funds.

I certify that I have examined this letter and to the best of my
knowledge and belief it is true, correct and complete. Please call me
at (214) 788-3030 with any questions or comments you may have.

Very truly yours,

Perot Petition Committee

By:


Mike Pons, Treasurer

98902437320923

SECURITY A

Security Pacific Bank
811 East 16th Avenue
Anchorage, Alaska 99503

One Bank
300 West Capitol
Little Rock, Arkansas 72001

Union Bank & Trust
100 Broadway
Denver, Colorado 80209

Fleet Bank
4707 Main Street
Bridgeport, Connecticut 06606

Industrial Bank of Washington
4812 Georgia Avenue, N.W.
Washington, D.C. 20004

Barnett Bank of Tallahassee
Main Office
315 South Calhoun Street
Tallahassee, Florida 32301

Barnett Bank of Broward County, N.A.
2929 East Commercial Boulevard
Ft. Lauderdale, Florida 33308

Barnett Bank of Northwest Florida
189 Northeast Eglin Parkway
Ft. Walton Beach, Florida 32548

Barnett Bank of South Florida, N.A.
1414 Alton Road
Miami, Florida 33139

Barnett Bank of Pinellas County
One Progress Plaza
St. Petersburg, Florida 33701

NBD Park Ridge Bank
1 South Northwest Highway
Park Ridge, Illinois 60068

Bank One
111 Monument Circle
Indianapolis, Indiana 45277

Metcalf State Bank
P.O. Box 4249
Overland Park, Kansas 66204

9 0 0 8 4 3 3 16 20 22 24

92893452062509
Citizens Fidelity Bank & Trust Company
1250 Bardstown Road
Louisville, Kentucky 40204-1333

Norvest Bank Minnesota
55 East Fifth Street
St. Paul, Minnesota 55101

Central Bank
238 Madison
Jefferson City, Missouri 65101

First Citizens Bank
P.O. Box 578
Bozeman, Montana 59715

United Jersey Bank/Central N.A.
3140 Princeton Pike
Lawrenceville, New Jersey 08648

First Interstate Bank
3433 South Maryland
Las Vegas, Nevada 89109

EAB
114 Old County Road
Mineola, New York 11501

Chemical Bank
30 Rockefeller Plaza
New York, New York 10112

United Carolina Bank
310 East John Street
Matthews, North Carolina 28105

Bank Center One
1101 East Interstate Avenue
Bismarck, North Dakota 58501

Bank One
65 East State Street
Columbus, Ohio 43271-0333

Boatmans Bank of Oklahoma
P.O. Box 25189
120 N. Robinson
Oklahoma City, Oklahoma 73215

First Interstate Bank of Oregon
1300 S. W. Fifth Avenue
Portland, Oregon 97201

Old Stone Bank
86 S. Main St.
Providence, Rhode Island 02903

Peoples Federal Savings & Loan Association
2200 Oak Street
Myrtle Beach, South Carolina 29577

First American National Bank
3021 West End Avenue
Nashville, Tennessee 37203

Chittenden Bank
2 Burlington Square
Burlington, Vermont 05402

U.S. Bank of Washington
Fourth & Battery Branch
2411 Fourth Avenue
Seattle, Washington 98101

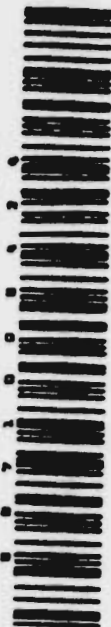
Putname County Bank
P.O. Box 308
Hurricane, West Virginia 25526

9 8 7 0 2 4 0 3 3 8 7 6 5 2 0 0 0 2 6

92037520927

5071005424

5071005424



5-13-92

5-13-92

Mr. Clayton Mulford

214 716-6501

Perot Petition Committee

Federal Election Commission

6406 245 Parkway, Suite 150

999 E Street, N.W.

Encls.

Seven

75240

Washington

D.C.

20463

31400/270

DESTINATION COPY

CUSTOMER
PLEASE REMOVE ONE OF THESE LABELS AND
PLACE IT ABOVE THE AIRMAIL POCKET

5071005424

5071005424

98043863212

HUGHES & LUCE, L.L.P.
A REGISTERED LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS

1021 MAIN STREET
SUITE 1300
HOUSTON, TEXAS 77002
(713) 794-3200
FAX (713) 794-3206

1717 MAIN STREET
SUITE 2800
DALLAS, TEXAS 75201
(214) 939-5500
FAX (214) 939-6100
TELEX 730636

111 CONGRESS AVENUE
SUITE 900
AUSTIN, TEXAS 78701
(512) 482-6000
FAX (512) 482-6059

Direct Dial Number
(214) 939-5570

April 21, 1992

Mr. James L. Swarts
Commerce Bank of St. Louis N.A.
800 Forsyth Boulevard, 6th Floor
Clayton, MO 63105

Dear Mr. Swarts:

The Perot Petition Committee is the principal campaign committee for Mr. Ross Perot. This firm is acting as counsel to the Perot Petition Committee. Mr. Perot filed a Statement of Candidacy (FEC Form 2) with the Federal Election Committee on March 20, 1992. A Statement of Organization (FEC Form 1) was filed with the Federal Election Committee on March 27 and a copy of this statement was filed with the Missouri Office of Secretary of State contemporaneously. Copies of these filings are enclosed. The Perot Petition Committee operates in Missouri through Missouri for Perot. The Missouri coordinator for the Perot Petition Committee is Mr. Kevin Laughlin. Mr. Laughlin and Missouri for Perot have the authority to act on behalf of the Perot Petition Committee to petition Missouri voters with the goal of placing Mr. Perot's name on the general election ballot as a candidate for President of the United States.

Should any questions arise regarding the activities of the Perot Petition Committee, Missouri for Perot or Mr. Laughlin, please contact me at the number provided above.

Thank you for your assistance in this matter.

Very truly yours,


Ethan K. Knowlden

EXHIBIT

10

INDEXED

EXHIBIT NO. 6

30606278.96

WITHDRAWAL
of
PRESIDENTIAL ELECTOR

I, _____, do hereby withdraw as a candidate for the office of Presidential
Elector for the state of Missouri in the general election to be held on the 3rd day of
November, 1992.

Signature

Printed Name



98043863214

WITHDRAWAL
of
PRESIDENTIAL ELECTOR

I, _____, do hereby withdraw as a candidate for the office of Presidential
Elector for the state of Missouri in the general election to be held on the 3rd day of
November, 1992.

Signature

Printed Name

98043863215
— original of form sent from Dallas
SME

EXHIBIT

12

30600270.116

OATH AND CERTIFICATE
of
PRESIDENTIAL ELECTOR

I, Mark J. Dotzler Jr., a registered voter of the State of Missouri, being first duly sworn, do hereby agree to serve as a candidate for the office of Presidential Elector on behalf of Ross Perot and his designated running mate in the general election to be held on the 3rd day of November, 1992. I hereby certify, swear, depose and attest that, if elected, I will faithfully carry out my duties as a Presidential Elector for Ross Perot and will cast my votes in the electoral college in accordance with the United States Constitution and the laws and procedures of the State of Missouri for each of Ross Perot and the candidate for Vice President designated by him.

I certify, swear, depose and attest that I am and will remain qualified for the office of Presidential Elector, that I am not an employee of, and do not hold a position of trust or profit under, the government of the United States, and that I have entered into this Oath fully appraised of my obligations hereunder and shall fulfill those obligations in accordance with the provisions hereof.

Signature

Printed Name

Date

ACKNOWLEDGMENT

THE STATE OF _____ §

COUNTY OF _____ §

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared Mark J. Dotzler Jr., who acknowledged to me that he/she had entered into this Oath fully appraised of the obligations thereunder, and had sworn to fulfill those obligations in accordance with the provisions thereof.

GIVEN UNDER MY HAND AND SEAL OF OFFICE this _____ day
of _____, 1992.

Name

Notary Public in and for the State
of _____

My Commission Expires:

EXHIBIT

13

A

OATH AND CERTIFICATE
of
PRESIDENTIAL ELECTOR

I, Edward I. Dyck, a registered voter of the State of Missouri, being first duly sworn, do hereby agree to serve as a candidate for the office of Presidential Elector on behalf of Ross Perot and his designated running mate in the general election to be held on the 3rd day of November, 1992. I hereby certify, swear, depose and attest that, if elected, I will faithfully carry out my duties as a Presidential Elector for Ross Perot and will cast my votes in the electoral college in accordance with the United States Constitution and the laws and procedures of the State of Missouri for each of Ross Perot and the candidate for Vice President designated by him.

I certify, swear, depose and attest that I am and will remain qualified for the office of Presidential Elector, that I am not an employee of, and do not hold a position of trust or profit under, the government of the United States, and that I have entered into this Oath fully appraised of my obligations hereunder and shall fulfill those obligations in accordance with the provisions hereof.

Edward I. Dyck
Signature

Edward I. Dyck
Printed Name

5/6/92
Date

ACKNOWLEDGMENT

THE STATE OF Missouri §
COUNTY OF St Louis §

EXHIBIT

14

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared Edward I. Dyck, who acknowledged to me that he/she had entered into this Oath fully appraised of the obligations thereunder, and had sworn to fulfill those obligations in accordance with the provisions thereof.

GIVEN UNDER MY HAND AND SEAL OF OFFICE this 6 day
of May, 1992.

Cynthia Metz
Name

Notary Public in and for the State
of Missouri, St Charles Co.

My Commission Expires:

June 17, 1994

CYNTHIA METZ
NOTARY PUBLIC - STATE OF MISSOURI
ST. CHARLES COUNTY
MY COMMISSION EXPIRES JUNE 17, 1994

PPC 0070

30600270.116

98043863217

MISSOURI FOR PEROT

"GRASSROOTS PRESIDENTIAL CAMPAIGN"

MAIL: 3020 S. NATIONAL/BOX 238/SPRINGFIELD, MO 65804/(417)889-VOTE
OFFICE: 2754 S. CAMPBELL/SPRINGFIELD, MO

TO: CHRISTOPHER DAVID SCHLARMAN

HALLIE H. GIBBS II

LISA QUEEN

PATRICK D. HINCHEY

RODNEY ROGGOW

MICHAEL PONDER

✓ KEVIN L. LAUGHLIN

/ MARK J. DOTZLER

✓ ROBERT REASON (FORMERLY KNOWN AS ROBERT KEITH McKEOWN)

✓ EDWARD I. DYCK

✓ CARRIE ALSPA

Mark

ENCLOSED YOU WILL FIND TWO FORMS I AM FORWARDING TO YOU FOR YOUR SIGNATURES. THESE FORMS ARE BEING SIGNED BY EVERY PRESIDENTIAL ELECTOR IN EVERY STATE ACROSS THE UNITED STATES. OF COURSE, IT IS UNDERSTOOD THAT EACH OF YOU WOULD NOT HAVE CONSENTED TO BE ON THE PETITIONS AS PRESIDENTIAL ELECTORS FOR ROSS PEROT IF YOU DID NOT BELIEVE THAT HE IS THE BEST CHOICE TO BE PRESIDENT. YOUR LOYALTY TO MR. PEROT IS NOT IN QUESTION. PLEASE VIEW THESE TWO DOCUMENTS AS MERE FORMALITIES. FOR THAT IS EXACTLY WHAT THEY ARE.

I HAVE ENCLOSED STAMPED, ADDRESSED ENVELOPES, FOR YOUR CONVENIENCE. PLEASE RETURN THEM TO ME AT YOUR EARLIEST CONVENIENCE. I MUST ACCOUNT FOR ALL SIGNED DOCUMENTS AND FORWARD THEM TO THE PEROT PETITION COMMITTEE. PHOTOCOPY FOR YOUR RECORDS; RETURN THE ORIGINAL TO ME.

EVEN THOUGH YOU ARE PARTICIPATING IN THIS HISTORIC PROCESS FOR YOURSELF, AND YOUR COUNTRY, I STILL WANT TO THANK YOU.

VERY SINCERELY YOURS,

Sandy McClure

98043863210

98043863219

DECLARATION OF CANDIDACY FOR
PRESIDENT OF THE UNITED STATES

I, H. Ross Perot, a resident and registered voter of Precinct No. 1143 of the City of Dallas in the County of Dallas and the State of Texas do announce myself a candidate for the office of President of the United States as an independent candidate, to be voted for at the general election to be held on the 3rd day of November, 1992, and I further declare that if nominated and elected I will qualify. Pursuant to Section 115.321 of the Missouri Election Laws, I hereby consent to the printing of "Ross Perot" on the official ballot for the State of Missouri.



H. Ross Perot
10444 Strait Lane
Dallas, Texas 75229

Subscribed and sworn to before me this 5th day
of June, 1992.


Notary Public

My commission expires:

5-21-93



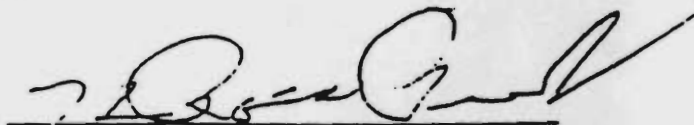
PPC 0066

30600270.153

980433220

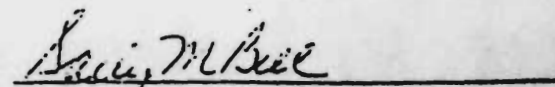
DECLARATION OF CANDIDACY FOR
PRESIDENT OF THE UNITED STATES

I, H. Ross Perot, a resident and registered voter of Precinct No. 1143 of the City of Dallas in the County of Dallas and the State of Texas do announce myself a candidate for the office of President of the United States as an independent candidate, to be voted for at the general election to be held on the 3rd day of November, 1992, and I further declare that if nominated and elected I will qualify. Pursuant to Section 115.321 of the Missouri Election Laws, I hereby consent to the printing of "Ross Perot" on the official ballot for the State of Missouri.



H. Ross Perot
10444 Strait Lane
Dallas, Texas 75229

Subscribed and sworn to before me this 5th day
of June, 1992.


Notary Public

My commission expires:

5-21-93

REC'D
SECY. OF STATE

JUL 20 P 2:21

FILED

EXHIBIT

16

Post

67

9804366221

STATE OF TEXAS)
COUNTY OF DALLAS) ss.

CONSENT OF PRESIDENTIAL CANDIDATE

I, Ross Perot, whose name appears on a Presidential petition filed with the Secretary of State, do hereby accept the candidacy of President, as an independent candidate.

I am in all respects qualified. I am over thirty-five years of age, a natural born citizen of the United States, and a resident within the United States for at least fourteen years. I consent voluntarily and of my own free will to have my name printed on the ballot together with James Stockdale as a candidate for Vice-President, as an independent candidate.

Home Address 10444 Strait Lane, Dallas, Texas 75229

Business Address 1700 Lakeside Square, 12377 Merit Drive
Dallas, Texas 75251

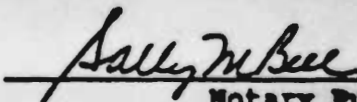
Home Phone

Business Phone (214) 788-3000



Ross Perot

Subscribed in my presence and sworn to before me by the same Ross Perot, this 5th day of June, 1992.



Notary Public

My commission expires 5-21-93.



98043863223

Ross Perot
1700 Lakeside Square
12377 Marit Drive
Dallas, Texas 75251

August 3, 1992

Mr. Ken Hechler
Secretary of State
State Capitol
Charleston, WV 25305

Re: Vice President and Presidential Elector Candidates

Dear Mr. Hechler:

Pursuant to the request of your office, I hereby certify to you the following five individuals as candidates for the office of Presidential Elector for the State of West Virginia:

1. Brian Butcher; P. O. Box 828; Hurricane, WV 25526
2. Mike Lyzenga; P. O. Box 452; Hurricane, WV 25526
3. Edward B. DelGrande; 2045 Parkwood Road,
Charleston, WV 25330
4. Nancy Sarver; 407 C Street; South Charleston, WV 25303
5. David Peters; Parkersburg, WV 26101

In addition, also pursuant to the request of your office, I hereby certify to you that Mr. James Stockdale is my vice presidential running mate in the November 3 general election. Mr. Stockdale's address is 547 A Avenue, Coronado, California 92118.

Sincerely,

Ross Perot

ACKNOWLEDGMENT

Texas
was

instrument was acknowledged before me
8/3/, 1992 by Ross Perot.

Sally M. Bee

Notary Public in and for
the State of Texas

Expires:

8/21/93

98043863224

FILED
1992 AUG - 5 AM 8:35
NOTARY PUBLIC
STATE OF TEXAS

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

August 12, 1992

FILED

AUG 14 1992

Ms. Cheryl A. Lau
Secretary of State
Capitol Complex
Carson City, NV 89710

CHERYL LAU
SECRETARY OF STATE

Dear Ms. Lau:

Pursuant to NRS § 298.109, I hereby designate the following four registered voters of the State of Nevada as candidates for the office of presidential elector:

Della Bernhard
1604 East Lewis Street
Las Vegas, Nevada 89101

Paul Fisher
711 Yucca Street
Boulder City, Nevada
89005

Janett Hunt
1511 Wesley Drive
Reno, Nevada 89503

Barbara J. Patterson
441 Glen Manor Drive
Reno, Nevada 89509

Thank you for your assistance in this matter.

Very truly yours,


Ross Perot

GIVEN UNDER MY HAND AND SEAL OF OFFICE this 13th
day of August, 1992.


Name

Notary Public in and for the
State of _____

My Commission Expires: _____



EXHIBIT

19

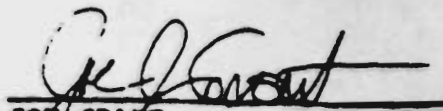
98043863225

AFFIDAVIT OF JOE GRANT

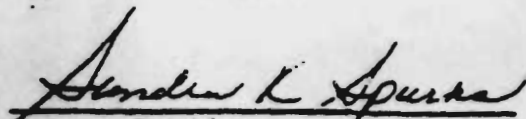
Re: MUR 3963 - Perot '92 and Mike Boss, as Treasurer

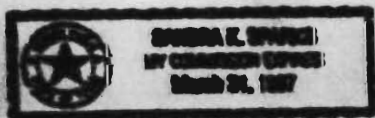
I, JOE GRANT, being duly sworn, depose and say:

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


Sandra K. Spurna
Notary Public

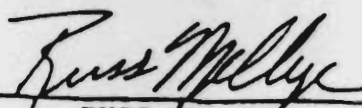


AFFIDAVIT


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

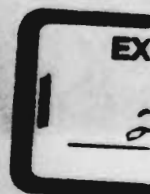
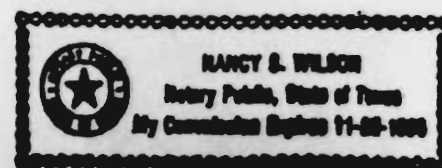
I, RUSS MELBYE, being duly sworn, depose and say:

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 MELBYE

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


Notary Public





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 24, 1997

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

RE: MUR 4631

Dear Mr. Dyck:

This letter acknowledges receipt on September 9, 1997, of the amendment to the complaint you filed on April 21, 1997. The respondent(s) will be sent copies of the amendment. You will be notified as soon as the Federal Election Commission takes final action on your complaint.

Sincerely,

A handwritten signature in dark ink, appearing to read "F. Andrew Turley", is written over a horizontal line.

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

98043863229



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 24, 1997

John W. Lemkemeier, Esq.
Bryan Cave, LLP
One Metropolitan Square
211 N. Broadway, Suite 3600
St. Louis, MO 63102-2750

RE: MUR 4631

Dear Mr. Lemkemeier:

On April 28, 1997, you were notified that the Federal Election Commission received a complaint from Edward Dyck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your clients were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On September 9, 1997, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information. The amendment was not sent to you earlier due to administrative oversight. As this new information is considered an amendment to the original complaint, you are hereby afforded an additional 15 days in which to respond to the allegations.

If you have any questions, please contact Jennifer Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 219-3690.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Andrew Turley", is written over a horizontal line.

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 24, 1997

Tom Luce, Esq.
Hughes & Luce, LLP
1717 Main Street, Suite 2800
Dallas, TX 75201

RE: MUR 4631

Dear Mr. Luce:

The Federal Election Commission received an amendment to a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the original complaint and amendment is enclosed. We have numbered this matter MUR 4631. Please refer to this number in all future correspondence.

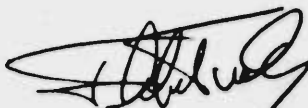
The amendment was not sent to you earlier due to administrative oversight. Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis 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.

Page 2

If you have any questions, please contact Jennifer Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

9 8 0 4 3 8 6 3 2 3 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 24, 1997

R. Clayton Mulford, Esq.
Hughes & Luce, L.L.P.
1717 Main Street, Suite 2800
Dallas, TX 75201

RE: MUR 4631
H. Ross Perot
The Perot Group

Dear Mr. Mulford:

On April 28, 1997, your clients were notified that the Federal Election Commission received a complaint from Edward Dyck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your clients were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On September 9, 1997, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information. The amendment was not sent to you earlier due to administrative oversight. As this new information is considered an amendment to the original complaint, you are hereby afforded an additional 15 days in which to respond to the allegations.

If you have any questions, please contact Jennifer Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 219-3690.

Sincerely,

F. Andrew Tarley
Supervisory Attorney
Central Enforcement Docket

Enclosure



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 24, 1997

Alan C. Kohn
Kohn, Shands, Elbert, Gianoulakis & Giljum, LLP
One Mercantile Center
24th Floor
St. Louis, MO 63101

RE: MUR 4631
Sandra Stone McClure
Alan C. Kohn

Dear Mr. Kohn:

On April 28, 1997, you and your client were notified that the Federal Election Commission received a complaint from Edward Dyck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your clients were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On September 9, 1997, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information. The amendment was not sent to you earlier due to administrative oversight. As this new information is considered an amendment to the original complaint, you are hereby afforded an additional 15 days in which to respond to the allegations.

If you have any questions, please contact Jennifer Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 219-3690.

Sincerely,

A handwritten signature in dark ink, appearing to read "F. Andrew Turley".

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 24, 1997

R. Clayton Mulford, Esq.
Hughes & Luce, L.L.P.
1717 Main Street, Suite 2800
Dallas, TX 75201

RE: MUR 4631

Dear Mr. Mulford:

The Federal Election Commission received an amendment to a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the original complaint and amendment is enclosed. We have numbered this matter MUR 4631. Please refer to this number in all future correspondence.

The amendment was not sent to you earlier due to administrative oversight. 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.

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Page 2

If you have any questions, please contact Jennifer Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

9 8 0 4 3 8 6 3 2 3 6



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 24, 1997

Kim J. Askew, Esq.
Hughes & Luce, LLP
1717 Main Street, Suite 2800
Dallas, TX 75201

RE: MUR 4631

Dear Ms. Askew:

The Federal Election Commission received an amendment to a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the original complaint and amendment is enclosed. We have numbered this matter MUR 4631. Please refer to this number in all future correspondence.

The amendment was not sent to you earlier due to administrative oversight. 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.

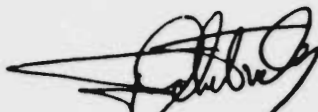
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed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

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Page 2

If you have any questions, please contact Jennifer Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

9 8 0 4 3 8 6 3 2 3 8

HUGHES & LUCE, L.L.P.

Attorneys and Counselors

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

Writers Direct Dial Number

214/939-5416

Other Offices

Austin
Houston

October 2, 1997

VIA FEDERAL EXPRESS

F. Andrew Turley, Esq.
Supervisor Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Jennifer Boyt

Re: MUR 4631: The Perot Group/Ross Perot
Kim Askew
Tom Luce
Ross Clayton Mulford

Dear Mr. Turley and Ms. Boyt:

This letter is filed in response to your letters dated September 24, 1997, giving notice of an amendment to the most recent complaint filed by Edward Dyck. In the amendment Mr. Dyck mentions me and two other members of this firm, as well as The Perot Group as original respondent. This pattern is familiar. Mr. Dyck also mentioned each of us in a January 1997 amendment to one of his earlier complaints, MUR 4541, which was dismissed the same day Mr. Dyck amended this complaint to include us. MUR 4541, as well as MURs 4316 and 3963, contain the same hodge-podge of irrelevancies and outrageous allegations of nefarious acts as does the current MUR and amendment. No new allegations are contained in Mr. Dyck's latest filing. Instead, he simply reiterates prior unspecified allegations which have been addressed in

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

HUGHES & LUCE, L.L.P.

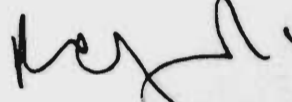
F. Andrew Turley, Esq.

October 2, 1997

Page 2

responses to MUR 4631 and in responses to complaints and supplements to MURs 3963, 4316, and 4541. The allegations remain unsubstantiated, frivolous, and without merit. They are unequivocally denied. For these reasons and those contained in the various responses to Mr. Dyck's prior MURs, we ask that this matter be dismissed.

Very truly yours,



R. Clayton Mulford

98043063240

RCM:rmn

Attachments: Designation of Counsel by Kim Askew
Designation of Counsel by Tom Luce

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4631

NAME OF COUNSEL: R. Clayton Mulford

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

ADDRESS: 1717 Main Street

Suite 2800

Dallas, Texas 75201

TELEPHONE: (214) 939-5416

FAX: (214) 939-6100

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.

11/1/97
Date

Thomas W. Luce, III
Signature

RESPONDENT'S NAME: Thomas W. Luce, III

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

1717 Main Street, Suite 2800

Dallas, Texas 75201

TELEPHONE: HOME ()

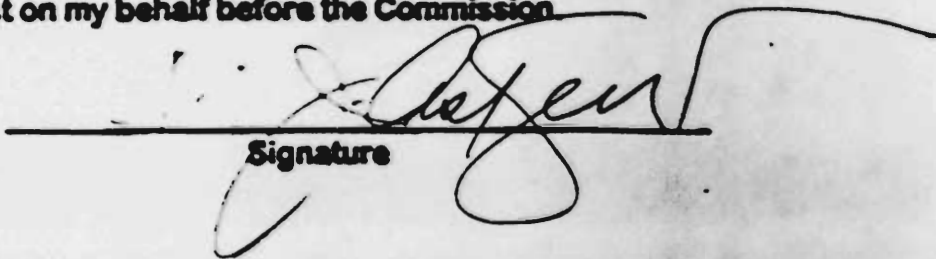
BUSINESS (2314) 939-5500

98043863241

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4631NAME OF COUNSEL: R. Clayton MulfordFIRM: Hughes & Luce, L.L.P.ADDRESS: 1717 Main StreetSuite 2800Dallas, Texas 75201TELEPHONE: (214) 939-5416FAX: (214) 939-6100

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
SignatureRESPONDENT'S NAME: Kim J. AskenADDRESS: Hughes & Luce, L.L.P.1717 Main Street Suite 2800Dallas, Texas 75201TELEPHONE: HOME() BUSINESS(214) 939-5500

98043863242

KOHN, SHANDS, ELBERT, GIANOULAKIS & GILJUM, LLP

ATTORNEYS AT LAW

ONE MERCANTILE CENTER, 24TH FLOOR

ST. LOUIS, MISSOURI 63101

(314) 241-0003

TELECOPIER (314) 241-2500

ALAN C. KOHN
COURTNEY SHANDS, JR.
HAROLD L. ELBERT
JOHN GIANOULAKIS
JOSEPH P. GILJUM
JOHN A. KLOBASA
MARK J. BREMER
CHARLES S. ELBERT
ROBERT A. USERTED
LISA A. PARK

ROBERT F. MURRAY
DAVID A. CASTLEMAN
BECKY L. HUINKER

October 3, 1997

VIA FAX AND FEDERAL EXPRESS

Mr. F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: Response on Behalf of Sandra S. McClure and
Her Attorney, Alan C. Kohn
Amendment to MUR 4631

Dear Mr. Turley:

I submit this response on behalf of Sandra S. McClure and myself, Alan Kohn, in the above-referenced amended complaint filed by Edward Dyck. This is the fourth response we have filed with the Commission regarding Ed Dyck's baseless allegations. The first two responses pertained to MUR 4541 which was closed by the F.E.C. on August 29, 1997.

Our third response, and now this response, relate to MUR 4631. We replied to the original MUR 4631 complaint on May 15, 1997. A copy of that response is attached and hereby incorporated by reference. All allegations under MUR 4631 concerning Ms. McClure and myself were addressed in that letter. The amended complaint requires no response from us since it presents nothing new. We restate and reaffirm our response contained in the May 15, 1997 letter, and again ask that this Complaint be dismissed.

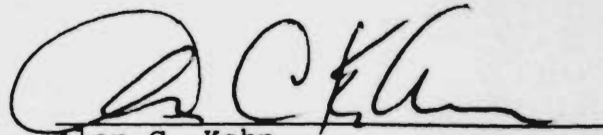
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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

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Mr. F. Andrew Turley
October 3, 1997
Page 2

KOHN, SHANDS, ELBERT,
GIANOULAKIS & GILJUM, LLP.

A handwritten signature in dark ink, appearing to read 'A C Kohn', written over a horizontal line.

Alan C. Kohn
One Mercantile Center
Suite 2410
St. Louis, MO 63101
(314) 241-3963
(314) 241-2509

98043863244

KOHN, SHANDS, ELBERT, GIANOULAKIS & GILJUM, LLP

ATTORNEYS AT LAW

ONE MERCANTILE CENTER, 24TH FLOOR

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ALAN C. KOHN
COURTNEY SHANDS, JR.
HAROLD I. ELBERT
JOHN GIANOULAKIS
JOSEPH P. GILJUM
JOHN A. KLOBASA
MARK J. BREMER
CHARLES S. ELBERT
ROBERT A. UERTED
LISA A. PARK

ROBERT F. MURRAY
DAVID A. CASTLEMAN
BEGGY L. HUINKER

May 15, 1997

VIA FAX AND FEDERAL EXPRESS

Mr. F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: Response on Behalf of Sandra S. McClure and
Her Attorney, Alan C. Kohn
MUR 4631

Dear Mr. Turley:

I submit this response on behalf of Sandra S. McClure and myself, Alan Kohn, in the above-referenced complaint filed by Edward Dyck. I enclose a copy of Mrs. McClure's designation of me as her counsel. The original was mailed directly to you by Mrs. McClure. This is the third response we have filed with the Commission regarding Ed Dyck's baseless allegations. The first two responses pertained to MUR 4541.

1. On May 17, 1996, the Perot Reform Committee properly disbursed \$8,223.26 to Sandy McClure for consulting fees. By letter dated October 25, 1996, Edward Dyck (FEC File MUR 4541) filed a Complaint with the FEC alleging, without any foundation whatsoever, that the money was paid to me to represent her in meritless litigation filed by Mr. Dyck in federal court in St. Louis. That litigation is under submission on a Motion for Summary Judgment filed by the Defendants, including Mrs. McClure. In his FEC Complaint, Mr. Dyck admitted he had no basis for his

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Mr. F. Andrew Turley
May 15, 1997
Page 2

FEC allegations but asked the FEC to "please verify this [his complaint] for me".

2. On December 12, 1996, Ross Perot, the Perot Reform Committee (PRC) and Perot '96 responded to the Complaint. The response pointed out the background for Mr. Dyck's allegations and enclosed documentary evidence proving that the PRC paid \$8,223.26 to Mrs. McClure for time and expenses and properly reported that item to the FEC. That money was not paid to me.

3. By letter dated December 15, 1996, I, on behalf of Mrs. McClure, also responded to the Complaint in which I pointed out that the Complaint is pure harassment and that Mrs. McClure has no reporting obligations to the FEC and, hence, the FEC lacks jurisdiction over her.

4. On February 7, 1997, Mr. Dyck filed a "supplement" to his Complaint which was a hodge-podge of irrelevancies which in no way detracted from the responses of December 12 and 15 and which added me and my young associate, John Lemkemeier, among others, to the list of persons about whom Mr. Dyck was complaining.

5. By letters dated February 20 and 21, I and Mr. Lemkemeier, as well as Ms. Kim Askew on behalf of the PRC, herself and others, pointed out the emptiness of Mr. Dyck's allegations.

6. Now Mr. Dyck has filed his Second FEC Complaint which has been given a new number (MUR 4631), but which contains essentially nothing new. At best, it shows that Perot '92 properly reported that it paid my law firm legal fees at various times between May 1, 1995 and December 28, 1995. These payments violate no law and do not establish any jurisdiction over Mrs. McClure, me, Mr. Lemkemeier or my law firm.

For the reasons stated above and in my other responses above noted, I ask that both Complaints be dismissed forthwith and that this harassment be brought to a halt.

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Mr. F. Andrew Turley
May 15, 1997
Page 3

KOHN, SHANDS, ELBERT,
GIANOULAKIS & GILJUM, LLP.

Alan C. Kohn
One Mercantile Center
Suite 2410
St. Louis, MO 63101
(314) 241-3963
(314) 241-2509

98043863247

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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)
)
)
)

**CASE CLOSURES UNDER
ENFORCEMENT PRIORITY**

FEB 11 3 10 PM '93

GENERAL COUNSEL'S REPORT

I. INTRODUCTION.

The cases listed below have been identified as either stale or of low priority based upon evaluation under the Enforcement Priority System (EPS). This report is submitted to recommend that the Commission no longer pursue these cases.

II. CASES RECOMMENDED FOR CLOSURE.

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

EPS was created to identify pending cases which, due to the length of their pendency in inactive status or the lower priority of the issues raised in the matters relative to others presently pending before the Commission, do not warrant further expenditure of resources. Central Enforcement Docket (CED) evaluates each incoming matter using Commission-approved criteria which results in a numerical rating of each case.

Closing cases permits the

Commission to focus its limited resources on more important cases presently

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pending before it. Based upon this review, we have identified 16 cases that do not warrant further action relative to other pending matters.¹ The attachment to this report contains summaries of each case, the EPS rating, and the factors leading to assignment of a low priority and recommendation not to further pursue the matter.

B. Stale Cases

Effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. Investigations concerning activity more remote in time usually require a greater commitment of resources, primarily due to the fact that the evidence of such activity becomes more difficult to develop as it ages. Focusing investigative efforts on more recent and more significant activity also has a more positive effect on the electoral process and the regulated community. In recognition of this fact, EPS provides us with the means to identify those cases which remained unassigned for a significant period due to a lack of staff resources for effective investigation. The utility of commencing an investigation declines as these cases age, until they reach a point when activation of a case would not be an efficient use of the Commission's resources.

¹ These cases are: MUR 4631 (Preston/Claw); MUR 4661 (Cox and Amplicon, Inc.); MUR 4667 (Specter & Greenwood); MUR 4668 (Schakowsky for Congress); MUR 4672 (Friends of John O'Toole); MUR 4673 (Papan for Assembly); MUR 4676 (Warren County Democratic Committee); MUR 4677 (Patrick Kennedy); MUR 4681 (Jack Black); MUR 4683 (Janice Schakowsky for Congress); MUR 4684 (Spartanburg County Republicans); MUR 4694 (Jan Schakowsky for Congress); MUR 4695 (Schakowsky for Congress); MUR 4696 (Janice Schakowsky for Congress); MUR 4703 (Dumont Institute / Robert McGee); and Pre-MUR 386 (Pritsker for Congress).

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We have identified cases which have remained on the Central Enforcement Docket for a sufficient period of time to render them stale. We recommend 27 of these cases be closed.³ Nine of these cases were part of the so-called "Major 96" cases that have not been able to be activated due to a lack of resources to effectively pursue them in a timely fashion.⁴ Since the time period rendering them stale has now passed, we recommend their closure at this time.

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective February 24, 1998. Closing

³ These cases are: MUR 4350 (Republican Party of Minnesota); MUR 4395 (Aqua-Lessure Industries, Inc.); MUR 4372 (Nebraska Democratic Party); MUR 4394 (Americans for Term Limits); MUR 4472 (Committee to Elect Winston); MUR 4483 (Nebraska Democratic State Central Committee); MUR 4504 (NH Democratic State Party Committee); MUR 4507 (People for Boechert); MUR 4509 (Villstone for Senate); MUR 4545 (Bell for Congress); MUR 4570 (Congresswoman Andrea Seastrand); MUR 4571 (Sybert for Congress Committee); MUR 4572 (Friends of Doc B. Dorton); MUR 4575 (Dana Corrington); MUR 4585 (Hughes for Congress Committee); MUR 4589 (Congressman Burt Gordon); MUR 4593 (Iowa Public Tribunal); MUR 4595 (Public Interest Institute); MUR 4599 (Bruce W. Hopenance); MUR 4601 (Charter Nation of Oklahoma); MUR 4602 (WFSS-TV Channel 3); MUR 4604 (Dana Corrington); MUR 4605 (Christian Coalition); Pre-MUR 346 (Coalition of Politically Active Christians); RAD 96NF-09 (O'Sullivan for Congress); RAD 96L-12 (Alaska Democratic Party); and RAD 97NF-02 (Zien for Congress).

⁴ These cases are: MUR 4350 (Republican Party of Minnesota); MUR 4372 (Nebraska Democratic Party); MUR 4394 (Americans for Term Limits); MUR 4472 (Committee to Elect Winston); MUR 4483 (Nebraska Democratic State Central Committee); MUR 4504 (NH Democratic State Party Committee); MUR 4507 (People for Boechert); MUR 4509 (Villstone for Senate); and MUR 4545 (Bell for Congress).

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these cases as of this date will permit CED and the Legal Review Team the necessary time to prepare closing letters and case files for the public record.

III. RECOMMENDATIONS.

A. Decline to open a MUR, close the file effective February 24, 1998, and approve the appropriate letters in the following matters:

- | | | |
|----------------|----------------|----------------|
| 1. RAD 96NF-09 | 3. RAD 97NF-02 | 5. Pre-MUR 356 |
| 2. RAD 96L-12 | 4. Pre-MUR 346 | |

B. Take no action, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

- | | | |
|--------------|--------------|--------------|
| 1. MUR 4350 | 14. MUR 4575 | 27. MUR 4668 |
| 2. MUR 4355 | 15. MUR 4585 | 28. MUR 4672 |
| 3. MUR 4372 | 16. MUR 4589 | 29. MUR 4673 |
| 4. MUR 4394 | 17. MUR 4592 | 30. MUR 4676 |
| 5. MUR 4472 | 18. MUR 4593 | 31. MUR 4677 |
| 6. MUR 4483 | 19. MUR 4599 | 32. MUR 4681 |
| 7. MUR 4504 | 20. MUR 4601 | 33. MUR 4683 |
| 8. MUR 4507 | 21. MUR 4602 | 34. MUR 4684 |
| 9. MUR 4509 | 22. MUR 4604 | 35. MUR 4694 |
| 10. MUR 4565 | 23. MUR 4605 | 36. MUR 4695 |
| 11. MUR 4570 | 24. MUR 4631 | 37. MUR 4696 |
| 12. MUR 4571 | 25. MUR 4661 | 38. MUR 4703 |
| 13. MUR 4572 | 26. MUR 4667 | |

2/1/98
Date

Lawrence M. Noble
General Counsel


98043863251



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/LISA R. DAVIS 
COMMISSION SECRETARY

DATE: FEBRUARY 19, 1998

SUBJECT: Case Closures Under Enforcement Priority. General
Counsel's Report dated February 11, 1998.

The above-captioned document was circulated to the Commission
on Thursday, February 12, 1998

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

Commissioner Aikens	—
Commissioner Elliott	—
Commissioner McDonald	<u>XXX</u>
Commissioner McGarry	—
Commissioner Thomas	<u>XXX</u>

This matter will be placed on the meeting agenda for
Tuesday, February 24, 1998.

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

98043863252

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) Agenda Document
Case Closures Under) No. X98-13
Enforcement Priority)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on February 24, 1998, do hereby certify that the Commission took the following actions with respect to Agenda Document No. X98-13:

1. Failed in a vote of 3-2 to pass a motion to approve the General Counsel's recommendations, subject to amendment of the closing date in recommendation A to read March 2, 1998, and subject to deletion of those cases listed in footnote 4 on Page 3 of the staff report.

Commissioners McDonald, McGarry, and Thomas voted affirmatively for the motion. Commissioners Aikens and Elliott dissented.

2. Decided by a vote of 5-0 to

A. Decline to open a MUR, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

- | | |
|----------------|----------------|
| 1. RAD 96NF-09 | 4. Pre-MUR 346 |
| 2. RAD 96L-12 | 5. Pre-MUR 356 |
| 3. RAD 97NF-02 | |

(continued)

B. Take no action, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

1. MUR 4350	20. MUR 4601
2. MUR 4355	21. MUR 4602
3. MUR 4372	22. MUR 4604
4. MUR 4394	23. MUR 4605
5. MUR 4472	24. MUR 4631
6. MUR 4483	25. MUR 4661
7. MUR 4504	26. MUR 4667
8. MUR 4507	27. MUR 4668
9. MUR 4509	28. MUR 4672
10. MUR 4565	29. MUR 4673
11. MUR 4570	30. MUR 4676
12. MUR 4571	31. MUR 4677
13. MUR 4572	32. MUR 4681
14. MUR 4575	33. MUR 4683
15. MUR 4585	34. MUR 4684
16. MUR 4589	35. MUR 4694
17. MUR 4592	36. MUR 4695
18. MUR 4593	37. MUR 4696
19. MUR 4599	38. MUR 4703

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

Attest:

2-25-98
Date

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

98043863254



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

RE: MUR 4631

Dear Mr. Dyck:

On April 21, 1997, 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 March 2, 1998. 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,

A handwritten signature in dark ink, appearing to read "F. Andrew Turley", written over a horizontal line.

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

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MUR 4631
PEROT/McClure

Mr. Edward Dyck alleges that H. Ross Perot funneled personal funds through Perot '92 to pay for "not qualified campaign expenses." The complainant also alleges illegalities in the maintenance of a campaign depository in Missouri by the treasurer, Mike Poss, when there was no volunteer committee there. He also alleges that Mr. Poss was employed by the Perot Group during his tenure as treasurer.

John W. Lemkemeier responds that the complaint is without merit, as he never represented or had any involvement with Perot '92. As an attorney, however, he represented Ms. McClure in litigation brought by the complainant from which the substance of this complaint seems to be derived. Mr. Lemkemeier states that the continuing complaints filed by the complainant constitute harassment and should be dismissed.

Alan C. Kohn responds on behalf of himself and Ms. Sandra McClure. He asserts that this complaint is without merit and constitutes harassment. He states that the money paid to him was for legal fees. Mr. Kohn states that this complaint is similar in nature to other baseless complaints filed by Mr. Dyck against Kohn and his associates which were previously dismissed.

R. Clayton Mulford answers for himself, The Perot Group, H. Ross Perot, and attorneys Kim Askew and Tom Luce of his law firm, Hughes and Luce. In his response, he states that Mr. Dyck's complaint is the same as others by him which have been dismissed. Mr. Mulford affirms that Mike Poss was employed on a full-time basis by The Perot Group, a sole proprietorship owned by Ross Perot, during his tenure as the Perot 92 treasurer. Mr. Mulford further states that all payments to Mr. Poss for his campaign services were duly reported to the FEC as in-kind contributions. Mr. Mulford claims that the allegations by Mr. Dyck against he and his associates, Askew and Luce, are unsubstantiated, frivolous, and without merit.

This matter is less significant relative to other matters pending before the Commission.

98043063256



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

John W. Lemkemeier, Esq.
Bryan Cave LLP
One Metropolitan Square
211 N. Broadway, Suite 3600
St. Louis, MO 63102-2750

RE: MUR 4631

Dear Mr. Lemkemeier:

On April 28, 1997, 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 March 2, 1998.

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 Jennifer H. Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Andrew Turley".

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

98043063257

MUR 4631
PEROT/McClure

Mr. Edward Dyck alleges that H. Ross Perot funneled personal funds through Perot '92 to pay for "not qualified campaign expenses." The complainant also alleges illegalities in the maintenance of a campaign depository in Missouri by the treasurer, Mike Poss, when there was no volunteer committee there. He also alleges that Mr. Poss was employed by the Perot Group during his tenure as treasurer.

John W. Lemkemeier responds that the complaint is without merit, as he never represented or had any involvement with Perot '92. As an attorney, however, he represented Ms. McClure in litigation brought by the complainant from which the substance of this complaint seems to be derived. Mr. Lemkemeier states that the continuing complaints filed by the complainant constitute harassment and should be dismissed.

Alan C. Kohn responds on behalf of himself and Ms. Sandra McClure. He asserts that this complaint is without merit and constitutes harassment. He states that the money paid to him was for legal fees. Mr. Kohn states that this complaint is similar in nature to other baseless complaints filed by Mr. Dyck against Kohn and his associates which were previously dismissed.

R. Clayton Mulford answers for himself, The Perot Group, H. Ross Perot, and attorneys Kim Askew and Tom Luce of his law firm, Hughes and Luce. In his response, he states that Mr. Dyck's complaint is the same as others by him which have been dismissed. Mr. Mulford affirms that Mike Poss was employed on a full-time basis by The Perot Group, a sole proprietorship owned by Ross Perot, during his tenure as the Perot 92 treasurer. Mr. Mulford further states that all payments to Mr. Poss for his campaign services were duly reported to the FEC as in-kind contributions. Mr. Mulford claims that the allegations by Mr. Dyck against he and his associates, Askew and Luce, are unsubstantiated, frivolous, and without merit.

This matter is less significant relative to other matters pending before the Commission.

98043863258



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Alan C. Kohn, Esq.
Kohn, Shands, Elbert, Gianoulkis & Giljum, LLP
One Mercantile Center
24th Floor
St. Louis, MO 63101

RE: MUR 4631
Sandra McClure

Dear Mr. Kohn:

On April 28, 1997, the Federal Election Commission notified you and your client 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 and your client. See attached narrative. Accordingly, the Commission closed its file in this matter on March 2, 1998.

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Supervisory Attorney
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MUR 4631
PEROT/McClure

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Ross Clayton Mulford, Esq.
Hughes & Luce, L.L.P.
1717 Main Street, Suite 2800
Dallas, TX 75201

RE: MUR 4631
H. Ross Perot, The Perot Group, Kim J. Askew
and Thomas W. Luce, III

Dear Mr. Mulford:

On April 28, 1997, the Federal Election Commission notified you and 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 you and your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on March 2, 1998.

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F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

MUR 4631
PEROT/McClure

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE END OF MUR # 4631

DATE FILMED 3/25/98 CAMERA NO. 2

CAMERAMAN EEF

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