

PATTON BOGGS, L.L.P.  
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Aug 3 4 33 PM '98

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August 3, 1998

**Via Messenger**

Thomas J. Andersen, Esquire  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC

Re: MUR 4761

Dear Mr. Andersen:

The Association of Trial Lawyers of America Political Action Committee ("ATLAPAC"), through its counsel, submits this letter as its initial response to the Federal Election Commission's ("FEC") complaint issued on June 30, 1998. Our initial response seeks only to address a key procedural issue necessarily raised at this juncture and does not constitute ATLAPAC's position on the merits prior to the point at which the FEC may make a Probable Cause determination. We do so with the understanding that we will have the opportunity to provide such additional information prior to any decision by the Commission as to Probable Cause. For the reasons below, ATLAPAC respectfully requests that the FEC hold MUR 4761 in abeyance until such time as the FEC resolves the issue that is the crux of this matter: whether the Texas state and local party committees are affiliated. Once the FEC and the state and local party committees resolve the affiliation issue, ATLAPAC then will be in a position to respond fully and promptly on the merits.

**Facts**

Although the FEC has set forth accurately many of the facts surrounding this matter, ATLAPAC nonetheless believes that this recitation omitted certain pertinent facts demonstrating ATLAPAC's good faith and best efforts to comply with the remedial actions requested by the FEC. Accordingly, we draw attention to these additional highly relevant facts in our description.

On September 30, 1996, ATLAPAC made contributions in the amount of \$5,000 to the federal accounts of the Texas State Democratic Party and the Tarrant County Democratic Party.

PATTON BOGGS, L.L.P.

Mr. Thomas J. Andersen

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Similarly, on October 1, 1996, ATLAPAC made contributions in the amount of \$5,000 to each of the following Texas local Democratic party committees: Bexar, Dallas, Galveston, Harris, Jefferson, and Travis. Prior to making these contributions, it was represented to ATLAPAC that the Texas local party committees were not "affiliated" with the Texas state party under federal election law.

The FEC sent two form letters on May 21, 1997, from Ed Ryan, the FEC Reports Analyst responsible for analyzing ATLAPAC's reports, to Carmen Belafonte, ATLAPAC's Treasurer. The letters informed ATLAPAC that an internal review of ATLAPAC's FEC reports had uncovered contributions that "appeared" to violate 2 U.S.C. § 441a(a) as contributions to another political committee exceeding \$5,000 in a calendar year. The letters then requested that ATLAPAC inform the FEC within 15 days of its "corrective action" and provide copies of any refund requests. Further, the letters state that "[a]lthough the Commission may take further legal action regarding the excessive contributions, your prompt action in obtaining a refund . . . will be taken into consideration." The letters were identical except that one covered ATLAPAC's October monthly report and had as attachments copies of ATLAPAC's FEC reports covering its contributions to the Texas State Party and the Tarrant county party. The other letter covered ATLAPAC's Amended 12 Day Pre-General report and included the state party and Tarrant county party contributions, as well as the contributions to the other six county Democratic party committees.

On June 5, 1997, ATLAPAC's Coordinator, Heather Weaver, promptly responded to the FEC's correspondence from May 21, 1997, by sending a letter to Ed Ryan (Attachment 1). Ms. Weaver's letter stated that ATLAPAC believed the local county party committees were not affiliated with the state party committee. The letter asked the FEC to inform ATLAPAC immediately if the local party committees were in fact affiliated, so that ATLAPAC could "promptly take any and all necessary remedial action." On June 12, 1997, John D. Gibson, Assistant Staff Director of the FEC Reports Analysis Division, sent a letter to Carmen Belafonte claiming that ATLAPAC's response of June 5, 1997 was incomplete because it did not provide all the information requested by the FEC. The letter stated that local party committees were presumed to be affiliated with their state party committee, and that if the local party committees believed they were not affiliated they should submit an Advisory Opinion Request to the FEC on this issue. The letter instructed ATLAPAC to request refunds for contributions made in excess of \$5,000.

Heather Weaver promptly contacted the Jefferson, Harris, Galveston, Tarrant, Dallas, Bexar, and Travis county Democratic party committees in letters dated June 18, 1997, requesting a refund of ATLAPAC's \$5,000 contribution to each of these local party committees (Attachment 2). The letters indicated that the FEC had: questioned the local party committees'

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independence, informed ATLAPAC that its contributions would be presumed to be excessive, and instructed ATLAPAC to seek refunds. Heather Weaver sent a letter to Ed Ryan on June 23, 1997, responding to the June 12, 1997 letter from John D. Gibson (Attachment 3). Her letter indicated that ATLAPAC had requested refunds from the local party committees. In addition, she included attachments of ATLAPAC's letters dated June 18, 1997 to those committees, and she advised the FEC that ATLAPAC would amend its reports once it received refunds from the local party committees. The FEC's recitation of the facts of this matter essentially ends at this point.

Conspicuously absent from the FEC complaint are the following facts supported by the documentation accompanying this response. On June 28, July 3, July 7, and July 14 1997, the Dallas, Tarrant, Galveston and Harris county party committees each sent letters to Heather Weaver stating that: the committees had received ATLAPAC's request for a refund; they currently were addressing the issue with the FEC; and a refund was not required (Attachment 4). Heather Tureen<sup>11</sup> sent these responses to the FEC. First, on July 9, 1997, she sent Ed Ryan a fax attaching the June 28, 1997 response from the Dallas county party and asking Mr. Ryan for his views on the committee's response (Attachment 5). Ed Ryan did not respond to Ms. Tureen's fax. Second, on September 18, 1997, Heather Tureen sent a fax to Ed Ryan attaching the responses from the Harris, Galveston, Tarrant, and Dallas county parties (Attachment 6). ATLAPAC still did not receive a response from the FEC instructing ATLAPAC on how it should proceed after its requests for refunds to the Texas local party committees were denied. These omissions are puzzling in light of the fact that they show ATLAPAC's good faith efforts to comply with the FEC's request to seek refunds of the alleged potential impermissible contributions.

Nine months passed, and the next correspondence ATLAPAC received from the FEC was on June 23, 1998. The FEC had found reason to believe in MUR 4761 that ATLAPAC may have violated 2 U.S.C. § 441a(a)(2)(C) by making excessive contributions. On July 10, 1998, the FEC granted ATLAPAC an extension until August 3, 1998 to file its initial response to MUR 4761.

**The Commission Should Stay MUR 4761**

ATLAPAC, through its counsel, requests that the FEC stay further action on MUR 4761, holding the matter in abeyance until the FEC resolves the legal issue of whether the Texas state and local party committees are affiliated. The FEC will need to resolve this issue with the Texas

<sup>11</sup> Heather Weaver changed her name to Heather Tureen during the time that the events relevant to this MUR occurred.

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state and local party committees themselves, and we understand that this issue is the subject of a separate MUR currently proceeding.

The FEC should grant ATLAPAC's request for a stay for two reasons. First, requiring ATLAPAC to defend against MUR 4761 before the FEC decides the issue of affiliation with the Texas state and local party committees would force ATLAPAC to commit prematurely to a legal position and incur costs that might not be necessary. ATLAPAC's potential liability is contingent upon the result of the FEC's enforcement action against the Texas state and local party committees. It is indisputable that if the Texas state and local party committees are not affiliated, ATLAPAC did not commit the violations alleged by the FEC in MUR 4761.

If the FEC requires ATLAPAC to respond to MUR 4761, and the FEC subsequently loses its enforcement action against the Texas state and local party committees, ATLAPAC would suffer irreparable damage to its legal interests. The FEC would have forced ATLAPAC to commit to a legal position prematurely, while part of its legal rights were bound up in another ongoing proceeding. If ATLAPAC were to conciliate and pay a civil penalty, and subsequently the state and local party committees win their case, ATLAPAC would have paid a penalty for no reason. If ATLAPAC were to fight the FEC's complaint and ultimately win before the Commission, and the FEC subsequently loses its case against the state and local party committees, ATLAPAC would have incurred unnecessary legal expenses. Finally, if ATLAPAC were to fight the FEC's complaint and ultimately lose before the Commission or in district court, and subsequently the FEC were to lose its case against the state and local party committees, ATLAPAC would have paid a civil penalty without justification. Under any of these scenarios, and in the absence of a stay, ATLAPAC needlessly incurs costs or suffers penalties if the FEC loses its case against the state and local party committees.

Second, the central issue of MUR 4761, whether the state and local party committees are affiliated, does not involve ATLAPAC. The FEC should now resolve the question of affiliation through its enforcement action against the state and local party committees. As indicated, ATLAPAC has been responsive in every way possible to the FEC. ATLAPAC is not an adjudicator, and is not in a position to address the issue of affiliation. For this reason, ATLAPAC seeks to hold this matter in abeyance until the FEC decides this issue.

**ATLAPAC Acted in Good Faith**

The FEC should grant ATLAPAC's stay request because ATLAPAC acted in good faith at all times with respect to this matter and attempted to remedy the alleged potential violations identified by the FEC. ATLAPAC inquired in writing as to the status of the state and local party committees and the local party committees assured ATLAPAC that they were not affiliated with

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the state party committee.<sup>21</sup> ATLAPAC's coordinator promptly responded to the FEC's initial correspondence identifying potential excessive ATLAPAC contributions by requesting from the FEC a clarification of the affiliation status of the Texas state and local party committees. Once the FEC clarified that it believed the state and local party committees were affiliated, ATLAPAC expeditiously requested a refund from the local party committees to remedy any possible impermissible contributions. ATLAPAC then notified the FEC of its efforts to seek immediately refunds of contributions to the local party committees. After receiving responses from the local party committees refusing to refund ATLAPAC's contributions, ATLAPAC forwarded the responses to the FEC and sought advice on how to proceed.

As you well know, FEC reports analysts often identify potential impermissible contributions made by contributors and/or accepted by recipient committees. The FEC generally provides the parties involved an opportunity to "remedy" their potential violations by refunding the potentially impermissible contributions. Contributors generally follow the FEC's suggestion and obtain refunds of their contributions from recipient committees. Indeed, in this case ATLAPAC immediately sought a refund after the FEC identified several contributions as potentially impermissible. However, the local party committees refused to refund ATLAPAC's contributions. Through their inaction, the local party committees left ATLAPAC exposed to legal liability for excessive contributions with no possibility of remedying such alleged violations. The FEC should not penalize ATLAPAC for its good faith efforts to respond to the FEC's requests, nor force ATLAPAC to prejudge the critical legal issue of affiliation that is properly now before the FEC.

In sum, ATLAPAC urges the FEC to grant its request for a stay because: (1) ATLAPAC would surrender unnecessarily valued legal rights and incur substantial costs if the FEC forced ATLAPAC to answer the complaint on the merits at this point in the proceeding; (2) ATLAPAC is not an indispensable party to the FEC's resolution of the central issue of whether the Texas state and local party committees are affiliated; and (3) ATLAPAC acted in good faith throughout this matter.

<sup>21</sup> As a contributor, ATLAPAC had a relatively low duty to investigate the recipient of its contributions. The FEC traditionally holds recipient committees to a much higher standard than contributors in this regard.

PATTON BOGGS, L.L.P.

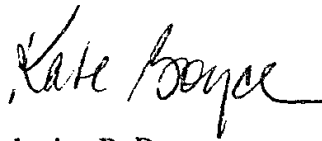
Mr. Thomas J. Andersen

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We look forward to receiving your response to our request. In the meantime, please do not hesitate to contact me at the number listed above.

Respectfully submitted,



Katharine R. Boyce

Jeffrey L. Ross

Counsel for the Association of Trial Lawyers of America  
Political Action Committee

KRB/JLR:slp

Attachments

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PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 5, 1997

Mr. Edward Ryan  
Senior Analyst  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Identification Number: C00024521

Reference: October Monthly Report (9/1/96-9/30/96)  
Amended 12 Day Pre-General (10/1/96-10/16/96) dated 11/25/96

Dear Ed:

I write in response to your letters of May 21, 1997 in which you notified ATLA PAC that it appeared to exceed the limits of 2 U.S.C. §441a(a) by making contributions to a political committee and its affiliates in excess of \$5,000 for a calendar year. As shown in our FEC reports, ATLA PAC made \$5,000 contributions to the Texas State Democratic Party and the following other political committees in the state of Texas: the Tarrant County Democratic Party, the Bexar County Democratic Party, the Dallas County Democratic Party, the Gavelston County Democratic Party, the Harris County Democratic Party, and the Jefferson County Democratic Party.

We understand that under 11 C.F.R. §110.3(b) local party committees share the same contribution limits as their state party committee, unless they can demonstrate their independence. It was and continues to be our understanding that the Texas party committees listed above have demonstrated their independence from the Texas State Democratic Party and are therefore subject to separate contribution limits. Prior to its contributions to the state party committee and the local party committees, it was represented to ATLA PAC that these local committees were independently run, controlled, and financed. If the local party committees are in fact affiliated party committees, please inform us immediately and we will promptly take any and all necessary remedial action.

Please do not hesitate to contact me to discuss this matter. As always, thank you for your patience and assistance.

Sincerely,



Heather Weaver  
Coordinator, ATLA PAC

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 HEATHER WEAVER  
**Counsel**  
 DANIEL COHEN

June 18, 1997

Gilbert Adams, Treasurer  
 Jefferson County Democratic Party  
 1855 Calder  
 Beaumont, TX 77701

Dear Mr. Adams:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Jefferson County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

*Heather Weaver*  
 Heather Weaver  
 Coordinator, ATLA PAC



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Counsel  
DANIEL COHEN

June 18, 1997

Myrtle Ross, Treasurer  
Harris County Democratic Party  
811 Westheimer  
Houston, TX 77006

Dear Ms. Ross:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Harris County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,



Heather Weaver  
Coordinator, ATLA PAC

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PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 18, 1997

Mary Ellen Brennan, Treasurer  
Galveston County Democratic Party  
912 Oak Vista Court  
Friendswood, TX 77548

Dear Ms. Brennan:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Galveston County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

*Heather Weaver*  
Heather Weaver  
Coordinator, ATLA PAC

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PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 18, 1997

Art Render, Treasurer  
Tarrant County Democratic Party  
719 North Beach Street  
Fort Worth, TX 76111

Dear Mr. Render:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on September 30, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Tarrant County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,



Heather Weaver  
Coordinator, ATLA PAC

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Treasurer  
CARMEN BELFONTE  
PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 18, 1997

Lisa Payne, County Chair  
Dallas County Democratic Party  
6440 N. Central Expressway, #416, LB18  
Dallas, TX 75206

Dear Ms. Payne:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Dallas County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,



Heather Weaver  
Coordinator, ATLA PAC

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♦  
Treasurer  
CARMEN BELFONTE  
PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 18, 1997

Bexar County Democratic Party  
517 N. Flores Street  
San Antonio, TX 78205

ATTENTION: Treasurer

Dear Sir / Madam:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Bexar County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

*Heather Weaver*  
Heather Weaver  
Coordinator, ATLA PAC

**ASSOCIATION  
of TRIAL LAWYERS  
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PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 18, 1997

Travis County Democratic Party  
505 West Lynn  
Austin, TX 78703

ATTENTION: Treasurer

Dear Sir / Madam:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Travis County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

*Heather Weaver*  
Heather Weaver  
Coordinator, ATLA PAC

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**PAC Coordinator**

**HEATHER WEAVER**

**Counsel**

**DANIEL COHEN**

Mr. Edward Ryan, Senior Analyst  
Federal Election Commission  
999 "E" Street, NW  
Washington, D.C. 20463

June 23, 1997

Identification Number: C00024521

Reference:

October Quarterly (9/1/96-9/30/96) and Amended 12 Day Pre-General  
(10/1/96-10/16/96 dated 11/25/96) Reports

Dear Ed:

I write to respond to correspondence I received from John D. Gibson of your office, dated June 12, 1997 concerning contributions ATLA PAC made to the Texas State Democratic Party and the following local county parties: (1) Tarrant County Democratic Party; (2) Bexar County Democratic Party; (3) Dallas County Democratic Party; (4) Galveston County Democratic Party; (5) Harris County Democratic Party; (6) Jefferson County Democratic Party; and (7) Travis County Democratic Party.

As I wrote to you previously, prior to making the contributions in question, ATLA PAC believed in good faith that the local Texas party committees listed above had demonstrated their independence from the Texas State Democratic Party and were therefore subject to separate contributions limits. I also noted that ATLA PAC was willing to take any and all necessary remedial action if the FEC determined that the local party committees were in fact affiliated with the state party committee or each other. The letter from Mr. Gibson indicates that local party committees are presumed to be affiliated with their state party counterparts and suggests that the local party committees submit an Advisory Opinion request to the Commission to establish their independence. It concludes by advising ATLA PAC to correct its alleged excessive contributions by requesting refunds from the recipient local party committees.

Upon receipt of Mr. Gibson's letter, ATLA PAC acted promptly to take the appropriate remedial action indicated. Once ATLA PAC receives refunds from the recipient local party committees, we will submit amendments for the October Quarterly report and the amended 12 Day Pre-General Report reflecting these refunds. I have attached copies of letters ATLA PAC sent to the local party committee recipients requesting refunds of ATLA PAC's contributions. I hope that these corrective actions resolve this matter.

As always, I appreciate your assistance and cooperation. Please do not hesitate to contact me with additional questions or concerns.

Sincerely,

*Heather*

Heather Weaver

Coordinator, ATLA PAC

Attachments

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Treasurer  
CARMEN BEEFONTE  
PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 18, 1997

Gilbert Adams, Treasurer  
Jefferson County Democratic Party  
1855 Calder  
Beaumont, TX 77701

Dear Mr. Adams:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Jefferson County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

*Heather Weaver*  
Heather Weaver  
Coordinator, ATLA PAC



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 HEATHER WEAVER  
**Counsel**  
 DANIEL COHEN

June 18, 1997

Myrtle Ross, Treasurer  
 Harris County Democratic Party  
 811 Westheimer  
 Houston, TX 77006

Dear Ms. Ross:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Harris County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,



Heather Weaver  
 Coordinator, ATLA PAC

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CARMEN BELFONTE  
PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 18, 1997

Mary Ellen Brennan, Treasurer  
Galveston County Democratic Party  
912 Oak Vista Court  
Friendswood, TX 77548

Dear Ms. Brennan:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Galveston County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

*Heather Weaver*

Heather Weaver  
Coordinator, ATLA PAC

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**Treasurer**  
CARMEN BELFONTE  
**PAC Coordinator**  
HEATHER WEAVER  
**Counsel**  
DANIEL COHEN

June 18, 1997

Art Render, Treasurer  
Tarrant County Democratic Party  
719 North Beach Street  
Fort Worth, TX 76111

Dear Mr. Render:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on September 30, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Tarrant County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,



Heather Weaver  
Coordinator, ATLA PAC

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of AMERICA**

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Treasurer  
CARMEN BELFONTE  
PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 18, 1997

Lisa Payne, County Chair  
Dallas County Democratic Party  
6440 N. Central Expressway, #416, LB18  
Dallas, TX 75206

Dear Ms. Payne:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Dallas County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,



Heather Weaver  
Coordinator, ATLA PAC

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Treasurer  
CARMEN BELFONTE  
PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 18, 1997

Bexar County Democratic Party  
517 N. Flores Street  
San Antonio, TX 78205

ATTENTION: Treasurer

Dear Sir / Madam:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Bexar County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

*Heather Weaver*

Heather Weaver  
Coordinator, ATLA PAC

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Treasurer  
CARMEN BELFONTE  
PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

June 18, 1997

Travis County Democratic Party  
505 West Lynn  
Austin, TX 78703

ATTENTION: Treasurer

Dear Sir / Madam:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Travis County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

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We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

*Heather Weaver*  
Heather Weaver  
Coordinator, ATLA PAC

# DALLAS COUNTY DEMOCRATIC PARTY

LISA Y. PAYNE  
Chair

June 28, 1997

Heather Weaver, Coordinator  
ATLA PAC  
1050 31st Street, N.W.  
Washington, D.C. 20007-4499

AUG 3 4 53 PM '97  
RECEIVED  
FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

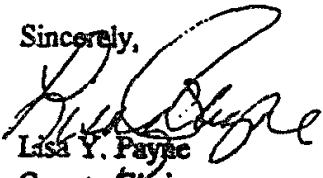
Dear Ms. Weaver:

We have received your request for a refund of your contribution to the Dallas County Democratic Party. We understand that the Federal Election Commission has contacted you about this contribution and raised a question about whether your political committee may have exceeded the contribution limits by contributing to the state and county party in Texas.

We are currently addressing this issue with the FEC and have provided information to demonstrate that the state and county Democratic parties are not affiliated, as that term is defined under the FEC's regulations. The county and state parties have been acting under the same structure for many years and there has never been any question of affiliation. Therefore, the state and county parties are not subject to one contribution limit. We are confident that the information we have provided to the FEC demonstrates that there is no affiliation and that the contribution your political committee made to the party is lawful.

Therefore, the refund that you have requested, apparently believing that this contribution was unlawful, is not required. We will alert you in the event there is any additional information that comes to our attention about this issue in the future.

Sincerely,

  
Lisa Y. Payne  
County Chair

# TARRANT DEMOCRATIC PARTY

Art Brender, Chairman

July 3, 1997

Heather Weaver  
Coordinator, ATLA PAC  
1050 31<sup>st</sup> St., N.W.  
Washington, D.C. 20007-4499

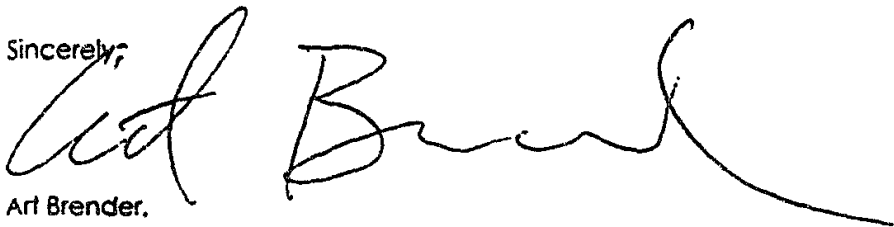
Dear Ms. Weaver:

We have received your request for a refund of your contribution to the Tarrant County Party. We understand that the Federal Election Commission has contacted you about this contribution and raised a question about whether your political committee may have exceeded the contribution limits by contributing to the state and county party in Texas.

We are currently addressing this issue with the FEC and have provided information to demonstrate that the state and county Democratic parties are not affiliated, as that term is defined under the FEC's regulations. The county and state parties have been acting under the same structure for more than 96 years and there has never been any question of affiliation. Therefore, the state and county parties are not subject to one contribution limit. We are confident that the information we have provided to the FEC demonstrates that there is no affiliation and that the contribution your political committee made to the party is lawful.

Therefore, the refund that you have requested, apparently believing that this contribution was unlawful, is not required. We will alert you in the event there is any additional information that comes to our attention about this issue in the future.

Sincerely,



Art Brender,  
County Chair  
Tarrant Democratic Party

AB/bf



**GALVESTON COUNTY DEMOCRATIC PARTY**

July 7, 1997

Association of Trial Lawyers of America  
Ms. Heather Weaver  
Coordinator, ATLA PAC  
1050 31st Street, N.W.  
Washington, D.C. 20007-4499


Dear Ms. Weaver:

In reference to your letter of June 18, 1997, please be advised that the Galveston County Democratic Party considers itself an independent organization and is not affiliated with the Texas State Democratic Party or any other county club or party.

As to your request for a refund of the much appreciated ATLA PAC's contribution of \$5,000 on October 1, 1996, please be advised that this organization does not have the funds or resources to make such a refund.

Should you have any further questions, please do not hesitate to contact me.

Sincerely,



Mary Ellen Brennan  
Treasurer/County Chair

zt7971b:wpd/dema

HARRIS COUNTY  
DEMOCRATIC  
| P | A | R | T | Y |  
★ ★ ★ ★ ★ ★

811 Westheimer, #208  
Houston, Texas 77006  
Tel: 713-522-9361  
Fax: 713-522-9622

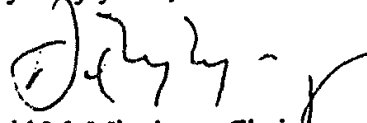
July 14, 1997

Ms. Heather Weaver  
Coordinator, ATLA PAC  
Association of Trial Lawyers of America  
Political Action Committee  
1050 31st St., NW  
Washington, DC 20007-4499

Dear Ms. Weaver:

We have received your letter regarding the funds distributed to the Harris County Democratic Party on October 1, 1996. We are aware of the FEC decision and, along with the other local parties and the state party, are appealing the decision. As soon as the matter is resolved, we will contact you. If you have any questions, please do not hesitate to contact me at 713-522-9361.

Very truly yours,



David M. Minberg, Chair  
Harris County Democratic Party

DMM:bm

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ROBERT STEINBERG, CA

LARRY STEWART, FL  
HOWARD TWIGGS, NC

Treasurer  
CARMEN BELEFONTE  
PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL COHEN

**FAX TRANSMITTAL SHEET**

**DATE:** July 9, 1997

**TO:** Ed Ryan, Senior Analyst  
Reports Analysis Division

**FAX:**

**PHONE:**

**FROM:** Heather (Weaver) Tureen   
ATLA PAC Coordinator

**FAX:** 202-338-8709

**PHONE:** 202-965-3500, ext. 428

**PAGES TO FOLLOW:** 1

**MESSAGE:**

Ed,

Following is the response I received from the Dallas County Democratic Party.

Any thoughts?

Heather

# DALLAS COUNTY DEMOCRATIC PARTY

LISA Y. PAYNE  
Chair

June 28, 1997

Heather Weaver, Coordinator  
ATLA PAC  
1050 31st Street, N.W.  
Washington, D.C. 20007-4499

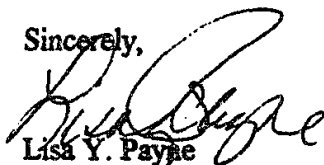
Dear Ms. Weaver:

We have received your request for a refund of your contribution to the Dallas County Democratic Party. We understand that the Federal Election Commission has contacted you about this contribution and raised a question about whether your political committee may have exceeded the contribution limits by contributing to the state and county party in Texas.

We are currently addressing this issue with the FEC and have provided information to demonstrate that the state and county Democratic parties are not affiliated, as that term is defined under the FEC's regulations. The county and state parties have been acting under the same structure for many years and there has never been any question of affiliation. Therefore, the state and county parties are not subject to one contribution limit. We are confident that the information we have provided to the FEC demonstrates that there is no affiliation and that the contribution your political committee made to the party is lawful.

Therefore, the refund that you have requested, apparently believing that this contribution was unlawful, is not required. We will alert you in the event there is any additional information that comes to our attention about this issue in the future.

Sincerely,



Lisa Y. Payne  
County Chair

\*\*\*\*\* -COMM. JCN\*\*\*\*\*

DATE JUL-09-1997

TIME 16:43 P.01

MODE = MEMORY TRANSMISSION

START=JUL-09 16:42

END=JUL-09 16:43

FILE NO. = 060

NO.	COM	ABBR/NTWK	STATION NAME/ TELEPHONE NO.	PAGES	PRG.NO.	PROGRAM NAME
001	OK		12022193496	002/002		

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**ASSOCIATION  
of TRIAL LAWYERS  
of AMERICA**

**POLITICAL  
ACTION  
COMMITTEE**

Board of Trustees  
Chairman  
BARRY NACE, DC  
CAROLYN RUFFIN, PA  
JEFFREY BAKT, VA  
CHAIK CARLIN, OH  
ROXANNE BARTON CONLIN, LA  
WALTER COSTELLO, MA  
LAWRENCE ELLIOTT, NY  
JAMES ERDMAN, DE

JAN WOODWARD FOX, TX  
ROBERT HANSEN, WI  
RICHARD HALEY, IN  
RUSSELL HERMAN, LA  
PAMELLA ANAGNOS LIAPAKIS, NY  
BRUCE MCMATH, AR  
MARK MANDIEL, RI  
JAMES MUNDY, PA  
JOHN POWERS, NY  
ROBERT STEINBERG, CA

LARRY STEWART, FL  
HOWARD TWIGGS, NC

Treasurer  
CARMEN BELEPONTI  
PAC Coordinator  
HEATHER WEAVER  
Counsel  
DANIEL CONIKY

## FAX TRANSMITTAL SHEET

DATE: July 9, 1997

TO: Ed Ryan, Senior Analyst  
Reports Analysis Division

FAX:

PHONE:

FROM: Heather (Weaver) Turcotte  
ATLA PAC Coordinator

FAX: 202-338-8709

PHONE: 202-965-3500, ext. 428

PAGES TO FOLLOW: 1

MESSAGE:

Ed,

Following is the response I received from the Dallas County Democratic Party.

Any thoughts?

Heather

**ASSOCIATION  
of TRIAL LAWYERS  
of AMERICA**

**POLITICAL  
ACTION  
COMMITTEE**

**Board of Trustees**  
Chairman  
BARRY NACE, DC  
CARMEN BELEFONTE, PA  
JEFFREY BREIT, VA  
CLAIR CARLIN, OH  
ROXANNE BARTON CONLIN, LA  
WALTER COSTELLO, MA  
LAWRENCE ELOVICH, NY  
JAMES ERISMAN, DE

JAN WOODWARD FOX, TX  
ROBERT HARUSH, WI  
RICHARD HAILEY, IN  
RUSS HERMAN, LA  
PAMELA ANAGNOS LIAPAKIS, NY  
BRUCE McMATH, AR  
MARK MANDELL, RI  
JAMES MUNDY, PA  
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HOWARD TWIGGS, NC

**Treasurer**  
CARMEN BELEFONTE  
**PAC Coordinator**  
HEATHER WEAVER  
**Counsel**  
DANIEL COHEN

**FAX TRANSMITTAL SHEET**

**DATE:** September 18, 1997

**TO:** Ed Ryan  
Reports Analysis Division

**FAX:** 202-219-3496

**PHONE:** 202-219-3580

**FROM:** Heather Tureen *HT*  
Director, ATLA PAC

**FAX:** 202-338-8709

**PHONE:** 202-965-3500, ext. 428

**PAGES TO FOLLOW:** 4

**MESSAGE:**

ATLA PAC has received the following four responses (regarding alleged excessive contributions) from the following Texas County Democratic Parties: Harris County, Galveston County, Tarrant County, and Dallas County.

Please do not hesitate to contact me with any questions regarding the following. Thank you.

HARRIS COUNTY  
DEMOCRATIC  
| P | A | R | T | Y |  
★ ★ ★ ★ ★ ★

811 Westheimer, #208  
Houston, Texas 77006  
Tel 713-522-9361  
Fax 713-522-9622

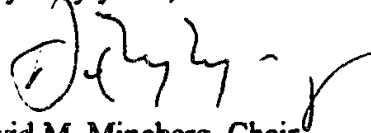
July 14, 1997

Ms. Heather Weaver  
Coordinator, ATLA PAC  
Association of Trial Lawyers of America  
Political Action Committee  
1050 31st St., NW  
Washington, DC 20007-4499

Dear Ms. Weaver:

We have received your letter regarding the funds distributed to the Harris County Democratic Party on October 1, 1996. We are aware of the FEC decision and, along with the other local parties and the state party, are appealing the decision. As soon as the matter is resolved, we will contact you. If you have any questions, please do not hesitate to contact me at 713-522-9361.

Very truly yours,



David M. Mincberg, Chair  
Harris County Democratic Party

DMM:bm

**GALVESTON COUNTY DEMOCRATIC PARTY**

July 7, 1997

Association of Trial Lawyers of America  
Ms. Heather Weaver  
Coordinator, ATLA PAC  
1050 31st Street, N.W.  
Washington, D.C. 20007-4499

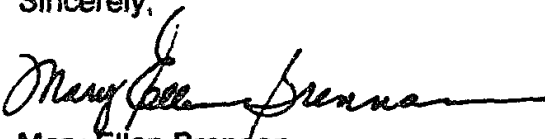
Dear Ms. Weaver:

In reference to your letter of June 18, 1997, please be advised that the Galveston County Democratic Party considers itself an independent organization and is not affiliated with the Texas State Democratic Party or any other county club or party.

As to your request for a refund of the much appreciated ATLA PAC 's contribution of \$5,000 on October 1, 1996, please be advised that this organization does not have the funds or resources to make such a refund.

Should you have any further questions, please do not hesitate to contact me.

Sincerely,



Mary Ellen Brennan  
Treasurer/County Chair

0170712 wpa/dsm



# TARRANT DEMOCRATIC PARTY

Art Brender, Chairman

July 3, 1997

Heather Weaver  
Coordinator, ATLA PAC  
1050 31<sup>st</sup> St., N.W.  
Washington, D.C. 20007-4499

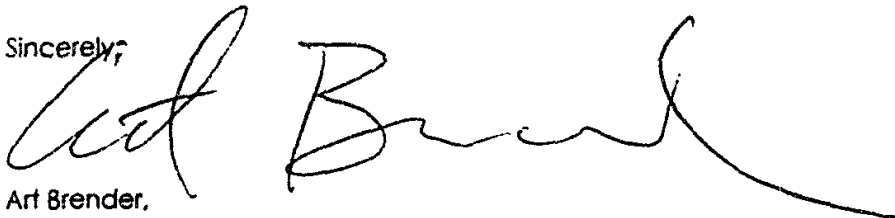
Dear Ms. Weaver:

We have received your request for a refund of your contribution to the Tarrant County Party. We understand that the Federal Election Commission has contacted you about this contribution and raised a question about whether your political committee may have exceeded the contribution limits by contributing to the state and county party in Texas.

We are currently addressing this issue with the FEC and have provided information to demonstrate that the state and county Democratic parties are not affiliated, as that term is defined under the FEC's regulations. The county and state parties have been acting under the same structure for more than 96 years and there has never been any question of affiliation. Therefore, the state and county parties are not subject to one contribution limit. We are confident that the information we have provided to the FEC demonstrates that there is no affiliation and that the contribution your political committee made to the party is lawful.

Therefore, the refund that you have requested, apparently believing that this contribution was unlawful, is not required. We will alert you in the event there is any additional information that comes to our attention about this issue in the future.

Sincerely,



Art Brender,  
County Chair  
Tarrant Democratic Party

AB/bf

# DALLAS COUNTY DEMOCRATIC PARTY

LISA Y. PAYNE

Chair

June 28, 1997

Heather Weaver, Coordinator  
ATLA PAC  
1050 31st Street, N.W.  
Washington, D.C. 20007-4499

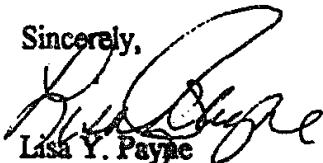
Dear Ms. Weaver:

We have received your request for a refund of your contribution to the Dallas County Democratic Party. We understand that the Federal Election Commission has contacted you about this contribution and raised a question about whether your political committee may have exceeded the contribution limits by contributing to the state and county party in Texas.

We are currently addressing this issue with the FEC and have provided information to demonstrate that the state and county Democratic parties are not affiliated, as that term is defined under the FEC's regulations. The county and state parties have been acting under the same structure for many years and there has never been any question of affiliation. Therefore, the state and county parties are not subject to one contribution limit. We are confident that the information we have provided to the FEC demonstrates that there is no affiliation and that the contribution your political committee made to the party is lawful.

Therefore, the refund that you have requested, apparently believing that this contribution was unlawful, is not required. We will alert you in the event there is any additional information that comes to our attention about this issue in the future.

Sincerely,



Lisa Y. Payne  
County Chair

\*\*\*\*\* -COMM. JOUR \*\*\*\*\* DATE SEP-1997 \*\*\*\*\* TIME 18:23 \*\*\* P.01

MODE = MEMORY TRANSMISSION

START=SEP-18 18:21

END=SEP-18 18:23

FILE NO. = 009

STN NO.	COMM.	ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK	2	12022193496	005/005	00:01'50"

-ATLAPAC

\*\*\*\*\* -TUREEN

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202 338 8709- \*\*\*\*\*

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