



FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, DC 20463

THIS IS THE END OF MUR # 1669

Date Filmed 7/15/85 Camera No. --- 1

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## FEDERAL ELECTION COMMISSION

MUR 1669

Conciliation materials; 12 day reports;Comment sheets; voting cards

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- |  |   |
|--|---|
| <input type="checkbox"/> (1) Classified Information                                | <input type="checkbox"/> (6) Personal privacy                             |
| <input type="checkbox"/> (2) Internal rules and practices                          | <input type="checkbox"/> (7) Investigatory files                          |
| <input checked="" type="checkbox"/> (3) Exempted by other statute                  | <input type="checkbox"/> (8) Banking Information                          |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents                         |   |

Signed

Maura E. Thier

date

June 27, 1985

FEC 9-21-77

85040530913



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1985

Michael F. Butler, Esquire  
Andrews and Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 1669  
Andrews, Kurth Lawyers for  
America Committee;  
Jerry V. Kyle, as treasurer

Dear Mr. Butler:

On June 17, 1985, the Commission accepted the conciliation agreement signed by you on behalf of your clients, Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, in settlement of a violation of 2 U.S.C. § 434, a provision of the Federal Election Campaign Act of 1971, as amended. You were previously notified on March 13, 1985, that the Commission determined to find no probable cause to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C), and no probable cause to believe the Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f). Accordingly, the file in this matter is now closed, and it will become part of the public record within 30 days.

Please be advised that 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondents and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. If you have any questions, please contact Maura White at 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

By: 

Kenneth A. Gross  
Associate General Counsel

Attachment  
Conciliation Agreement

cc: Jerry V. Kyle

85040530920



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Andrews, Kurth Lawyers for ) MUR 1669  
America Committee; )  
Jerry V. Kyle, as treasurer )

MAY 29 10:50

GENERAL COUNCIL

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer ("Respondents") violated 2 U.S.C. § 434.

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

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

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

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

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

1. Respondent, Andrews, Kurth Lawyers for America Committee, is a political committee registered with the Commission.

2. Respondent, Jerry V. Kyle, is the treasurer of the Andrews, Kurth Lawyers for America Committee.

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3. Andrews and Kurth is an unincorporated general partnership law firm.

4. During the period of January 1, 1981, through March 31, 1984, contributions to the Andrews, Kurth Lawyers for America Committee from the consenting partners of Andrews and Kurth were made through a voluntary check-off system by which the consenting partners authorized amounts to be charged against their separate partner accounts and withheld from amounts to be distributed to them. Andrews and Kurth then transferred to the Andrews, Kurth Lawyers for America Committee the amounts authorized by the consenting partners.

5. Respondents accepted an aggregate of \$27,500 from the individual partners of Andrews and Kurth during 1981 and reported such as contributions from Andrews and Kurth.

6. Respondents accepted an aggregate of \$8,000 from the individual partners of Andrews and Kurth during 1982 and reported such as contributions from Andrews and Kurth.

7. Respondents accepted an aggregate of \$20,000 from the individual partners of Andrews and Kurth during 1983 and reported such as contributions from Andrews and Kurth.

8. Respondents accepted \$10,000 from the individual partners of Andrews and Kurth on March 15, 1984, and reported such contributions from the "Partners of Andrews and Kurth."

9. Pursuant to 2 U.S.C. § 434(b)(3)(A) each report by a political committee is required to disclose the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of \$200 within the calendar year, . . . together with the date and amount of any such contribution.

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10. The term "identification" is defined at 2 U.S.C. § 431(13)(A) to mean in the case of any individual, the name, the mailing address, and the occupation of such individual, as well as the name of his or her employer.

V. Respondents violated 2 U.S.C. § 434(b)(3)(A) by failing to report the identification of individuals who made contributions to the Andrews, Kurth Lawyers for America Committee, together with the date and amount of any such contributions, during the period of January 1, 1981, through March 31, 1984.

VI. In order to avoid the expense of litigation, Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Seven Hundred and Fifty Dollars (\$750), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents will amend the reports of the Andrews, Kurth Lawyers for America Committee to disclose all contributions required to be reported under 2 U.S.C. § 434(b)(3)(A) during the period of January 1, 1981, through March 31, 1984.

VIII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

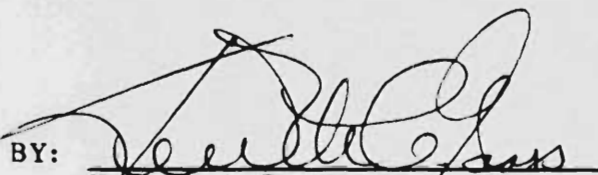
XI. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

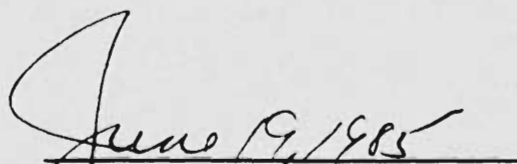
9 5 7 4 0 5 1 0 9 2 5

XII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

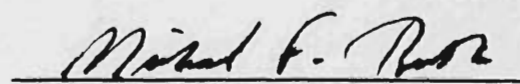
FOR THE COMMISSION:

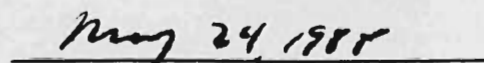
Charles N. Steele  
General Counsel

BY:   
Kenneth A. Gross  
Associate General Counsel

  
Date

FOR THE RESPONDENT:

  
Michael F. Butler  
Attorney for  
Andrews, Kurth Lawyers for  
America Committee, and  
Jerry V. Kyle, Treasurer

  
Date

85040530921

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Andrews, Kurth Lawyers for ) MUR 1669  
America Committee, Jerry )  
V. Kyle, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 17, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1669:

1. Accept the conciliation agreement with the Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer attached to the General Counsel's Report signed June 12, 1985.
2. Close the file.
3. Approve the letter attached to the General Counsel's Report signed June 12, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

6-18-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

6-13-85, 10:26  
6-13-85, 4:00

85040530925



600#7615

MEMORANDUM

TO: CHERYL THOMAS TO: JOAN HARRIS  
FROM: JOAN HARRIS FROM: CHERYL THOMAS

CHECK NO. 1081 (a copy of which is attached) RELATING  
TO MUR 1669 AND NAME Andrews, Kurth Lawyers for America  
Comte + Jerry V. Kyle, Pres  
WAS RECEIVED ON May 29, 1985. PLEASE INDICATE THE ACCOUNT INTO  
WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT (#95F3875.16)  
/ ☒ CIVIL PENALTIES ACCOUNT (#95-1099.160)

SIGNATURE Cheryl R. Thomas DATE 5/29/85

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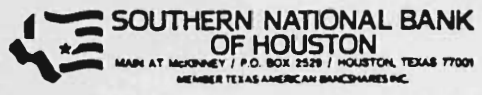
ANDREWS, KURTH LAWYERS  
~~XXXXXX~~ FOR AMERICA COMMITTEE  
2500 EXXON BUILDING 652-2500  
HOUSTON, TEXAS 77002

1081

May 23, 19 85 <sup>35-122</sup><sub>1130</sub>

PAY TO THE ORDER OF Federal Election Commission \$ 750.00

THE SUM 750 DOLS 00 CTS DOLLARS



FOR \_\_\_\_\_

*[Handwritten signature]*

⑈11130⑈0122⑈ ⑈ 068 627⑈



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1669  
Andrews, Kurth Lawyers )  
for America Committee )  
Jerry V. Kyle, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 26, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1669:

1. Enter into conciliation with the Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, prior to a finding of probable cause to believe.
2. Approve the conciliation agreement and letter attached to the General Counsel's Report signed April 23, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

4-26-85

Date

Jeddy C. Ransom  
for Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: 4-23-85, 2:16  
Circulated on 48 hour tally basis: 4-24-85, 11:00

35040530927

ACC# 7019  
White

ANDREWS & KURTH  
ATTORNEYS  
1730 PENNSYLVANIA AVENUE, N.W.  
SUITE 900  
WASHINGTON, D.C. 20006  
(202) 662-2700  
TELEX: 79-1208  
TELECOPIER (202) 662-2712

TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200

4400 THANKSGIVING TOWER  
DALLAS, TEXAS 75201  
(214) 979-4400

March 28, 1985

John Warren McGarry, Chairman  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: MUR No. 1669 In re Andrews & Kurth; Andrews & Kurth Lawyers for America  
Committee; Jerry v. Kyle, as treasurer

Dear Chairman McGarry:

By letter dated March 13, 1985, which I received March 18, 1985, you informed me that on February 26, 1985 the Federal Election Commission determined (1) that there is no probable cause to believe that Andrews & Kurth (the "Firm") violated 2 U.S.C. § 441a(a)(1)(C), and (2) that there is no probable cause to believe that Andrews, Kurth Lawyers for America Committee (the "Committee") and Jerry V. Kyle, as treasurer of the Committee, violated 2 U.S.C. § 441a(f). However, in that letter, you also informed me that the Commission determined that there is reason to believe that the Committee and Mr. Kyle violated 2 U.S.C. § 434 with regard to reports of receipts and disbursements filed by the Committee.

On behalf of the Committee and Mr. Kyle we wish to attempt to settle this matter through conciliation prior to a finding of probable cause to believe. As has always been the case, it is the very strong desire of the Firm, the Committee, and Mr. Kyle that they be in full compliance with the Federal Election Campaign Act.

I do wish to point out that in light of the long history of the communications between the Firm (and the Committee, Mr. Kyle and their counsel) and the Commission Staff in this case, the Commission's determination of reason to believe that the Committee and Mr. Kyle are in violation of 2 U.S.C. § 434 is rather surprising and appears to be inconsistent with the spirit of the Commission's procedure for dealing with possible reporting violations. See 2 Fed. Election Camp. Fin. Guide ¶ 9007.

On October 5, 1983, Ms. Theresa Harley of the Commission's Reports Analysis Division sent a letter to the Committee raising questions about the Committee's reports. On October 25, 1983, Mr. Kyle responded to Ms. Harley's letter, and after several subsequent telephone conversations with Ms. Harley regarding this matter, Seaborn Eastland, the Committee's custodian of records, sent a letter to her dated January 23, 1984, regarding the Committee's reporting of contributions from the Firm's partners. In that letter Mr. Eastland explicitly stated that the contributions in question were made separately by the individual partners of the Firm and identified all of such partners. At the close of his letter, Mr. Eastland stated:

"We trust this answers your questions completely and that you have available, and this PAC has reported to the Commission, all contributions by all individuals."

Although it now appears that this statement was not completely accurate in that the amount of contributions by various individual contributors in excess of \$200 was not reported, the Commission Staff did not respond to Mr. Eastland's letter.

Since the January 23, 1984, Eastland letter, the Firm, the Committee, and Mr. Kyle have received between them a total of six formal communications from the Commission with respect to alleged violations of 2 U.S.C. § 441a. <sup>1/</sup> The Firm, the Committee, Mr. Kyle or their counsel made various written responses to these formal communications and also had numerous conversations trying to convince the Office of General Counsel that the contributions involved were the contributions of the individual partners and not contributions by the Firm, a position which the Commission at long last appears to agree with. Yet in none of these six formal communications, and in none of the numerous informal conversations with the Office of General Counsel during this period, did the Commission Staff raise any question about the adequacy of the Committee's reports. Based on the lack of any response to Mr. Eastland's letter, and the complete silence of the Commission's Staff in the various conferences with it, the Committee and Mr. Kyle could fairly assume that the Commission's concerns about reporting had been satisfied and that if the Commission Staff had any additional questions it would have advised the Committee and Mr. Kyle.

In the course of over a year's review by the Commission's Staff during which there were numerous discussions with the Firm, the Committee, Mr. Kyle or their counsel concerning compliance with the Act, the Commission's Staff could have and should have advised the Committee and Mr. Kyle regarding questions it had concerning compliance with the 2 U.S.C. § 434 reporting requirements. Counsel finds it hard to understand why the Commission has waited so long before raising the issue of the the Committee's and Mr. Kyle's compliance with 2 U.S.C. § 434.

<sup>1/</sup> Letter dated April 12, 1984 from Lee Ann Elliott to the Firm; letter dated April 12, 1984 from Lee Ann Elliott to Mr. Kyle; letter dated June 26, 1984 from Lee Ann Elliott to the Firm; letter dated June 26, 1984 from Lee Ann Elliott to Mr. Kyle; letter dated September 14, 1984 from Charles N. Steele to Mr. Kyle; letter dated November 14, 1984 from Charles N. Steele to counsel for the Firm, the Committee and Mr. Kyle.

Very truly yours,

*Michael F. Butler/MS*

Michael F. Butler

83040530930

DREWS & KURTH

ATTORNEYS

PENNSYLVANIA AVENUE, N.W.

SUITE 700

WASHINGTON, D.C. 20006



John Warren McGarry, Chairman  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

8504053093

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 13, 1985

Michael F. Butler, Esquire  
Andrews and Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 1669  
Andrews and Kurth;  
Andrews, Kurth Lawyers for America  
Committee; Jerry V. Kyle,  
as treasurer

Dear Mr. Butler:

On February 26, 1985, the Commission determined that there is no probable cause to believe your client, Andrews and Kurth, violated 2 U.S.C. § 441a(a)(1)(C), and that there is no probable cause to believe your clients, Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).

Also on February 26, 1985, the Commission determined that there is reason to believe the Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 434, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your clients the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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Letter to Michael F. Butler  
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Warren McGarry". The signature is fluid and cursive, with the first name "John" being particularly prominent.

John Warren McGarry  
Chairman

Enclosure  
General Counsel's Factual and Legal Analysis

cc: Jerry Kyle

85040530933

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1669

RESPONDENTS: Andrews, Kurth Lawyers for America Committee  
Jerry V. Kyle, as treasurer

SUMMARY OF ALLEGATIONS

Respondents incorrectly reported contributions from individual partners in the law firm of Andrews and Kurth as contributions from the law firm.

FACTUAL BASIS AND LEGAL ANALYSIS

8 5 0 4 0 5 3 0 9 3 4  
Since the establishment of the Andrews, Kurth Lawyers for America Committee ("Committee") the partners of Andrews and Kurth ("Firm") have made individual contributions to the Committee pursuant to a voluntary check-off system by which they authorized amounts to be charged against their separate partner accounts and withheld from amounts to be distributed to them. The amounts withheld were then conveyed to the Committee via firm checks. During the period from January 1, 1981 through March 31, 1984, the Committee reported such receipts as contributions from the Firm, rather than the individual partners. \*/ Although on January 26, 1984, the Committee submitted the names of between 38 and 53 partners who contributed to the Committee during certain years from 1978 through 1983, the information did not contain the dates and amounts of each partners' respective contributions.

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\*/ On March 15, 1984, the Committee reported \$10,000 from the "Partners of Andrews and Kurth," but such partners were not identified pursuant to 2 U.S.C. §§ 434(b)(3)(A) or 431(13)(A).

Pursuant to 2 U.S.C. § 434(b)(3)(A), each report by a political committee shall disclose:

the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of \$200 within the calendar year, ... together with the date and amount of any such contribution.

Because the Committee reported the multiple individual contributions as single contributions by the Firm, the Committee's reports do not accurately reflect the names, dates and amounts of the contributions received, as required by 2 U.S.C. § 434(b)(3)(A). The General Counsel's Office, therefore, recommends that the Commission find reason to believe the Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 434(b)(3)(A).

85040530935

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Andrews and Kurth; )  
Andrews, Kurth Lawyers for ) MUR 1669  
America Committee; )  
Jerry V. Kyle, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the  
Federal Election Commission executive session of  
February 26, 1985, do hereby certify that the Commission  
decided by a vote of 6-0 to take the following actions in  
MUR 1669:

1. Find no probable cause to believe Andrews  
and Kurth violated 2 U.S.C. § 441a(a)(1)(C).
2. Find no probable cause to believe the  
Andrews, Kurth Lawyers for America Committee  
and Jerry V. Kyle, as treasurer, violated  
2 U.S.C. § 441a(f).
3. Find reason to believe that Andrews, Kurth  
Lawyers for America Committee and Jerry V.  
Kyle, as treasurer, violated 2 U.S.C.  
§ 434.
4. Direct the Office of General Counsel to send  
appropriate letters pursuant to these findings.

Commissioners Aikens, Elliott, Harris, McDonald,  
McGarry, and Reiche voted affirmatively for the decision.

Attest:

2-27-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

35040530936



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cut*  
DATE: February 13, 1985  
SUBJECT: MUR 1669 - General Counsel's Report

The attached is submitted as an Agenda document  
for the Commission Meeting of February 26, 1985

Open Session \_\_\_\_\_

Closed Session XX

CIRCULATIONS

48 Hour Tally Vote [ ]  
Sensitive [ ]  
Non-Sensitive [ ]  
24 Hour No Objection [ ]  
Sensitive [ ]  
Non-Sensitive [ ]  
Information [ ]  
Sensitive [ ]  
Non-Sensitive [ ]  
Other [X]

DISTRIBUTION

Compliance [X]  
Audit Matters [ ]  
Litigation [ ]  
Closed MUR Letters [ ]  
Status Sheets [ ]  
Advisory Opinions [ ]  
Other (see distribution below) [ ]

SENSITIVE

CIRCULATE ON BLUE PAPER

FOR AGENDA OF 2-26-85

83040530937



BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

In the Matter of )  
 )  
Andrews and Kurth; )  
Andrews, Kurth Lawyers for )  
America Committee; )  
Jerry V. Kyle, as treasurer )

MUR 1669

05 FEB 13 12:59

EXECUTIVE SESSION

FEB 26 1985

GENERAL COUNSEL'S REPORT

**SENSITIVE**

I. BACKGROUND

On April 10, 1984, the Commission determined that there is reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C) by making excessive contributions totalling \$40,500 to the Andrews, Kurth Lawyers for America Committee ("Committee") during the period of 1981 through 1983, and determined that the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totalling \$40,500 from Andrews and Kurth during 1981 through 1983. On June 22, 1984, the Commission determined that there is reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C) by contributing \$5,000 in excess of the contribution limitation to the Committee on March 15, 1984, and by paying the operating and solicitation costs of the Committee from 1981 through March 31, 1984. The Commission also determined on June 22, 1984, that the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f) by accepting \$5,000 in excess of the contribution limitation from Andrews and Kurth on March 15, 1984, and by accepting the payment of its operating and solicitation costs from Andrews and Kurth during the period from 1981 through March 31, 1984.

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General Counsel's Briefs were mailed to Andrews and Kurth and the Committee on November 14, 1984. On January 8 and 9, 1985, Andrews and Kurth and the Committee filed response briefs.

## II. LEGAL ANALYSIS

In their joint reply brief the respondents argue that the Commission "should not find probable cause to believe" that they each violated the Act. The respondents set forth several reasons as to why the Commission should determine that no violations occurred.

The respondents' brief explains that "[s]ince establishment of the Committee, the partners of the Firm have made individual contributions to the Committee pursuant to a voluntary check-off system by which they authorized amounts to be charged against their separate partner accounts and withheld from amounts to be distributed to them, and the amounts withheld to be transferred by the Firm to the Committee." The respondents admit that "[f]rom time to time, the Firm has issued Firm checks to the Committee in payment of the amounts withheld from the partners; these checks consisted of the total of the various individual contributions given by the partners." 1/

The respondents state that the "crux of the General Counsel's argument is that by virtue of using Firm checks to

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1/ The respondents' reply brief does not dispute the fact that Andrews and Kurth issued checks totalling \$65,500 to the Committee from 1981 through March 15, 1984.

85040530932

transfer the sum of the individuals partners' contributions to the Committee, the Firm, as well as the individual partners, made a contribution to the Committee and that such contribution by the Firm was subject to the limitations of 11 C.F.R. § 110.1(c)."

The respondents argue that:

Stripped to its essence the Office of General Counsel takes the position that even if a partnership has a valid check-off system by which the individual partners authorize the partnership to make deductions from their partnership accounts and to transmit the amounts deducted to a political committee, the partnership may not use a single check (or a series of checks) in excess of \$5,000 per year to transmit funds to a political committee, because the checks from the partnership constitute a contribution by the partnership that is in violation of the Act because a partnership is a 'person' under 2 U.S.C. § 431(11), and a 'person' may not contribute in excess of \$5,000 per year to a political committee.

The respondents central argument is that the instant matter "is controlled" by Advisory Opinion 1982-63 wherein the Commission concluded that the law firm partnership of Manatt, Phelps, Rothenberg, and Tunney "may offer the described check-off PAC contribution system to its noncorporate partners." 2/ The respondents contend that in approving the check-off system, which was described as one where the Firm would "transfer said amount directly" to the political committee established by the Manatt, Phelps firm, the Commission "could not have approved of anything

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2/ The reply brief argues that AO 1981-50 and AO 1982-13 "may properly be regarded as implicitly overruled" by AO 1982-63, and that AO 1982-13 is fundamentally different from the instant matter because Andrews and Kurth has a voluntary check-off system.

else but the use of a partnership check or checks to transfer the individual partners' contributions to the political committee." The respondents maintain that the Advisory Opinion "did not state that the partners' contributions withheld and transferred by the Manatt, Phelps firm to its political committee constituted a contribution by the partnership." The respondents, therefore, conclude that "unless the arrangement approved in the Manatt, Phelps AO was limited to total contributions of less than \$5,000 per year by all the Manatt, Phelps partners together, there is no basis for the General Counsel's claim that the Firm violated the Act," and "[s]ince the Commission in its Manatt, Phelps AO did not make any such limitation on its approval, the decision clearly authorizes what the Firm did in this case."

It is the view of this office that the respondents' reading and resulting interpretation of AO 1982-63 is incorrect. To be sure, the Commission in Advisory Opinion 1982-63 stated that the law firm may offer a check-off PAC contribution system to its noncorporate partners wherein the Firm proposed to transfer "said amount directly to the PAC." That the Advisory Opinion did not address the issue of whether the transfer of the monies through a firm check constituted a contribution by the firm itself, however, is clearly not a sufficient basis for concluding, as the respondents have, that the contribution limitations are not applicable to the partnership. The Commission's regulations and Advisory Opinions have clearly stated that a contribution

by a partnership is both a contribution from the partnership and the firm's consenting partners. See the General Counsel's Briefs in MUR 1669.

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A further argument presented by the respondents is that the General Counsel's position ignores analogous situations under the Act "where payment of a check by one person to a political committee does not constitute a contribution by that person," including payroll deductions made by corporations and labor unions to political committees. The respondents insist that the payments to the Committee by firm checks are no more "contributions" to the Committee "than payments of withheld payroll deductions by corporations or unions to political committees." It is the respondents position that "[a]t the time the funds were transmitted to the Committee, such funds could not under any circumstances be considered Firm funds" because "[o]nce such amounts had been withheld from a distribution properly payable to the partners, the Firm held such amounts as agents for the separate partners and could only disburse such amounts as authorized by each partner." Thus, the respondents ardently argue that the "funds involved were not funds of the Firm."

The respondents further argue that the procedure followed by Andrews and Kurth "is analogous in every significant respect to what corporations may properly do under the Act." The respondents maintain that because the Committee "is subject to essentially all the requirements applicable to a separate segregated fund," there is no "policy justification for the General Counsel's position in this case which is based on the



hollow formalism that a check written by a partnership must always be a contribution by the partnership."

Although the respondents are correct in stating that corporations and labor organizations may institute payroll deduction plans for contributions to their separate segregated funds, there is no provision in either the Act or the Commission's regulations which permits an unincorporated partnership to transfer funds to a political committee through a partnership check without triggering the partnership's contribution limitation. Absent such an express exemption, contributions made by a partnership check are required to be attributed to the partnership as well as the consenting partners, in the view of this Office.

A final argument raised by the respondents is that neither the Committee nor its treasurer "knowingly" accepted excessive contributions from Andrews and Kurth and, therefore, they did not violate 2 U.S.C. § 441a(f) because they both "reasonably believed that the checks were not contributions by the Firm." This argument also fails, in this office's view. 3/ The Act clearly

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3/ The respondents also contend that the Committee's treasurer did not violate § 441a(f) because he did not "knowingly accept a contribution for the benefit or use of a candidate" (emphasis added) (see 2 U.S.C. § 441a(f)). By stating that no officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, 2 U.S.C. § 441a(f) limits the personal liability of employees and officers of political committees. In this matter, however, the Commission has not found the treasurer personally liable but instead in his official capacity. Moreover, the Commission, on August 19, 1983, directed that committee treasurers in their official capacity would be named as a respondent in a MUR along with the committee.

distinguishes between "knowing" violations of law (see 2 U.S.C. §§ 441a(f), 441b(a), and 441f) and "knowing and willful" violations (see 2 U.S.C. § 437g(a)(5)(C) and (6)(C)). The legislative history of the 1976 amendments demonstrates that Congress intended that there be a fundamental difference between these two standards. The remarks of Congressman Hays during the House debates on the Conference Report demonstrate this intention:

Perhaps the most important phrase used in the enforcement section is 'knowing and willful.' As explained in House Report No. 94-917, that phrase refers to actions taken with full knowledge of all of the facts and a recognition that the action is prohibited by law (emphasis added).

122 Cong. Rec. H3778 (daily ed. May 3, 1976) (remarks of Congressman Hays). Mr. Hay's interpretation of the phrase is a reflection of the House Report (No. 94-917) which stated without qualification:

The bill [H.R. 12406] distinguishes between violations of the law as to which there is not a specific wrongful intent which are subject to injunctive relief and civil penalties of up to \$5,000 or the amount in question, whichever is greater, and violations as to which the Commission has clear and convincing proof that the acts were committed with a knowledge of all the relevant facts and a recognition that the action is prohibited by law, which are subject to injunctive relief and a penalty of \$10,000 or twice the amount in question (emphasis added).

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H.R. Rep. No. 94-917, 94th Cong., 2d Sess. 4-5 (1976).

Although "knowingly" is not defined in the Act or regulations, the term generally implies that a person has knowledge of the facts which establish a violation of the statute. See United States v. Aides, Inc., 211 F. Supp. 122, 125 (E.D. Pa. 1962) ("It is knowledge of the facts as opposed to knowledge of the law which is essential...."). Indeed, the courts have found that the term "knowingly," as used in § 441a(f), suggests that the recipient must only know that it received the contributions at issue, and not that the contributions exceeded the limitations in violation of the law. See Federal Election Commission v. California Medical Ass'n., 502 F. Supp. 196 (N.D. Cal. 1980); In re Federal Election Campaign Act Litigation, 474 F. Supp. 1044 (D.D.C. 1979).

In the instant matter the Committee and its treasurer knew that they accepted checks drawn on the account of Andrews and Kurth. This is reflected in the respondents' reply brief wherein it is stated "Mr. Kyle knew that the Firm checks he received ...." Moreover, the respondents admit that checks totalling \$65,500 were accepted from Andrews and Kurth. Hence, it is the view of this Office that the Committee and Jerry V. Kyle, as treasurer, "knowingly" accepted excessive contributions from Andrews and Kurth because they had knowledge of all of the facts of the situation even though they may not have known that the contributions were in violation of the Act.

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In consideration of the foregoing, it is the recommendation of this Office that the Commission find probable cause to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C) by contributing \$45,500 in excess of the contribution limitations during the period of 1981 through March 15, 1984, to the Andrews, Kurth Lawyers for America Committee, and by paying the operating and solicitation costs of the Committee from 1981 through March 15, 1984. 4/ This Office also recommends that the Commission find probable cause to believe the Andrews, Kurth Lawyers for America Committee, and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totalling \$45,500 from Andrews and Kurth during the period of 1981 through March 15, 1984, and by accepting the payment of its operating and solicitation costs from Andrews and Kurth from 1981 through March 15, 1984.


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4/ The reply brief states: "Respondents concede that if the Office of General Counsel is correct in its contentions about the Firm checks, they are also in violation with respect to the value of the administrative services."

IV. RECOMMENDATIONS

1. Find probable cause to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C).
2. Find probable cause to believe the Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).
3. Approve the attached conciliation agreements and letter.

12 February 1985  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

Attachments

- Proposed Conciliation Agreements (2)
- Letter (1)

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Michael F. Butler, Esquire  
Andrews and Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 1669

Dear Mr. Butler:

On , 1985, the Commission determined that there is probable cause to believe your client, Andrews and Kurth, violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions totalling \$45,500 to the Andrews, Kurth Lawyers for America Committee ("Committee"), and by paying the administrative and solicitation expenses of the Committee, during the period of January 1, 1981, through March 31, 1984. In addition, the Commission determined that there is reason to believe your clients, the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totalling \$45,500 from Andrews and Kurth, as well as accepting Andrews and Kurth's payment of the Committee's administrative and solicitation expenses, during the period of January 1, 1981, through March 31, 1984.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

We enclose conciliation agreements that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreements, please sign and return them to the Commission within ten days. I will then recommend that the Commission approve the agreements.

Attachment 2(1)

Letter to Michael F. Butler  
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreements, please contact Maura White, the staff member assigned to this matter, at 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

Enclosure  
Conciliation Agreements

cc: Jerry V. Kyle

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Perm file

ANDREWS & KURTH

ATTORNEYS

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 861-7400

TELEX: 79-1208

TELECOPIER (202) 861-7437

TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200

4400 THANKSGIVING TOWER  
DALLAS, TEXAS 75201  
(214) 978-4400

MEMORANDUM

TO: Maura White, Office of General Counsel  
FROM: Donald F. Santa, Jr., <sup>DFS</sup> Andrews & Kurth  
DATE: January 8, 1985  
RE: MUR 1669 Brief of Andrews & Kurth, et al.

Attached are an original and twelve copies of substitute pages to be inserted in the brief of Andrews & Kurth which was filed with the Office of General Counsel yesterday, January 7, 1985. These pages correct typographical errors on pages 11 and 15 of the brief. Clean cover pages are also attached. Thank you for your cooperation.

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BEFORE THE  
FEDERAL ELECTION COMMISSION

In the Matter of

Andrews & Kurth; Andrews, Kurth  
Lawyers for America Committee;  
Jerry V. Kyle, as treasurer

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MUR No. 1669

**BRIEF OF (1) ANDREWS & KURTH, (2) ANDREWS, KURTH  
LAWYERS FOR AMERICA COMMITTEE, AND (3) JERRY V. KYLE,  
TREASURER OF ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

Pursuant to 11 C.F.R. § 111.16(c), Andrews & Kurth (the "Firm"), Andrews, Kurth Lawyers for America Committee (the "Committee"), and Jerry V. Kyle, as treasurer ("Kyle") (collectively "Respondents"), hereby file this brief responding to the arguments presented in the briefs of the General Counsel of the Federal Election Commission (the "Commission"), dated November 13, 1984, and setting forth reasons why the Commission should not find probable cause to believe that Respondents violated the Federal Election Campaign Act of 1971, as amended (the "Act"), 2 U.S.C. § 431, et seq.

**APPLICABLE STATUTORY PROVISIONS AND REGULATIONS**

The Act at 2 U.S.C. § 441a(a)(1)(C) provides: (emphasis added)

No person shall make contributions—

- (a) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000;
- (b) to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000; or

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partnership." The General Counsel's brief cites the Manatt, Phelps AO, two other Advisory Opinions, AO 1981-50, and AO 1982-13, and Appendix D of the Commission's Campaign Guide in support of its conclusion that the payments in this case are contributions by the Firm. However, Appendix D does not discuss when a payment is a contribution by a partnership and merely sets forth the rules applicable to partnership contributions. As demonstrated above, the Manatt, Phelps AO stands for precisely the apposite conclusion than the one the General Counsel seeks. And AO 1981-50 (dated December 14, 1981) and AO 1982-13 (dated April 16, 1982) were both promulgated before the Manatt, Phelps AO, (dated February 10, 1983) and to the extent inconsistent may properly be regarded as implicitly overruled by the Manatt, Phelps AO. Also, the proper characterization of the partnership payments in AO 1981-50 and AO 1982-13 was not essential to the questions presented in those opinions. Finally, the situation in AO 1982-13 is fundamentally different from the situation in this case because the Firm in this case has a voluntary check-off system, while the firm in AO 1982-13 had no check-off system at all but rather an agreed upon in advance partnership total that was automatically charged to all partners on a proportionate basis and that all partners were required to participate in to the extent of their proportionate share.

As a general matter, payments made by one person do not necessarily constitute a "contribution" by that person. For example, a beneficiary of a trust may direct that the trustee make various payments from the income of the trust - such as a charitable contribution - and such payment is in fact and in law a charitable contribution by the beneficiary, not the trustee. Likewise payments made by an escrow agent holding funds will constitute a payment by the principal and not by the escrow agent.

the authorization of those partners, and could only be disbursed pursuant to the instruction of the various partners.

- D. The General Counsel's position in this case is purely a matter of form over substance with no policy justification.

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The procedure followed by the Firm in this case is analogous in every significant respect to what corporations may properly do under the Act. The check-off plan was limited to partners who are the equivalent of stockholders, executive or administrative personnel. The amounts withheld pursuant to the check-off plan were transmitted by the Firm to the Committee in the same fashion as corporations transmit amounts withheld from valid corporate check-off plans. And the Committee is subject to essentially all the requirements applicable to a separate segregated fund, and indeed subject to more stringent requirements, e.g., administrative services provided by the Firm to the Committee constitute a contribution by the Firm, while a corporation may freely provide administrative and other support services for its separate segregated fund without such services being a contribution. Compare 11 C.F.R. § 106.7(a)(1)(iii) with 11 C.F.R. § 114.5(b). Since corporations and partnerships are both defined as "persons" under the Act, and since the Act provides significantly greater restrictions on corporations than on partnerships, there is no policy justification for the General Counsel's position in this case which is based on the hollow formalism that a check written by a partnership must always be a contribution by the partnership.

The strained nature of the General Counsel's position can be seen in another way. Many law firms no longer use the partnership form, but rather have become professional corporations with the former partners becoming shareholders. Yet, such a professional corporation law firm could do exactly what the Firm did in this case without violation of the Act, and there seems little policy justification and no statutory justification to impose a more restrictive burden on law firm partnerships than on law firm professional corporations.

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ANDREWS & KURTH

ATTORNEYS

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 861-7400

TELEX: 79-1208

TELECOPIER (202) 861-7437

TEXAS COMMERCE TOWER

HOUSTON, TEXAS 77002

(713) 220-4200

4400 THANKSGIVING TOWER

DALLAS, TEXAS 75201

(214) 979-4400

January 7, 1985

Charles N. Steele, Esquire  
General Counsel  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

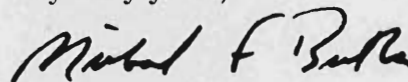
RE: MUR No. 1669 In re Andrews & Kurth; Andrews, Kurth Lawyers for  
America Committee; Jerry V. Kyle, at treasurer

Dear Mr. Steele:

I enclose the brief of Andrews & Kurth; Andrews, Kurth Lawyers for America Committee; and Jerry V. Kyle, as treasurer (collectively "Respondents") in the above-captioned matter, filed pursuant to an extension of time granted by the Federal Election Commission ("Commission"), along with nine (9) additional copies of Respondents' brief to be forwarded to the Commission and three (3) additional copies for the Office of General Counsel. Pursuant to the instructions of Ms. Maura White of the Office of General Counsel, counsel for Respondents are filing the original and copies of Respondents' brief with the Office of General Counsel in lieu of filing with the Secretary of the Commission.

Needless to say, we would be pleased to meet with you and your staff to discuss this matter further if you so desire.

Very truly yours,



Michael F. Butler

MFB/crw

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**BEFORE THE  
FEDERAL ELECTION COMMISSION**

In the Matter of

Andrews & Kurth; Andrews, Kurth  
Lawyers for America Committee;  
Jerry V. Kyle, as treasurer

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MUR No. 1669

**BRIEF OF (1) ANDREWS & KURTH, (2) ANDREWS, KURTH  
LAWYERS FOR AMERICA COMMITTEE, AND (3) JERRY V. KYLE,  
TREASURER OF ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

Pursuant to 11 C.F.R. § 111.16(c), Andrews & Kurth (the "Firm"), Andrews, Kurth Lawyers for America Committee (the "Committee"), and Jerry V. Kyle, as treasurer ("Kyle") (collectively "Respondents"), hereby file this brief responding to the arguments presented in the briefs of the General Counsel of the Federal Election Commission (the "Commission"), dated November 13, 1984, and setting forth reasons why the Commission should not find probable cause to believe that Respondents violated the Federal Election Campaign Act of 1971, as amended (the "Act"), 2 U.S.C. § 431, et seq.

**APPLICABLE STATUTORY PROVISIONS AND REGULATIONS**

The Act at 2 U.S.C. § 441a(a)(1)(C) provides: (emphasis added)

No person shall make contributions--

- (a) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000;
- (b) to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000; or

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- (c) to any other political committee in any calendar year which, in the aggregate, exceed \$5,000.

2 U.S.C. § 441a(f) provides: (emphasis added)

No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section. No officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures under this section.

The Act defines "person" as follows:

The term "person" includes an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons, but such term does not include the Federal Government or any authority of the Federal Government.

2 U.S.C. § 431(11) (emphasis added).

Section 110.1(e) of the Commission's regulations, 11 C.F.R. § 110.1(e)

(emphasis added), provides:

A contribution by a partnership shall--

- (1) Be attributed to each partner in direct proportion to his or her share of the partnership profits, according to instructions which shall be provided by the partnership to the Committee or candidate; or
- (2) Be attributed by agreement of the partners, as long as--
  - (i) Only the profits of the partners to whom the contribution is attributed are reduced (or losses increased), and
  - (ii) These partners' profits are reduced (or losses increased) in proportion to the contribution attributed to each of them; and

- (3) Not exceed the limits in paragraphs (a)(b) and (c) of this section.

Paragraphs (a), (b), and (c) of section 110 of the regulations implement the contribution limitations of 2 U.S.C. § 441a(a)(1)(C) of the Act.

Under the above statutory provisions, an individual may properly give up to \$5,000 per year to a political committee. Under the above regulation, however, when there is a contribution by a partnership, the partnership contribution (1) must be attributed (in the appropriate manner) to the various individual partners; and (2) may not exceed \$5,000 per year to a political committee. Thus, under the regulation, if a partnership had four individual partners with equal shares, a partnership contribution of \$10,000 to a political committee would presumably be attributed \$2,500 to each partner, but nevertheless would constitute a violation by the partnership since it exceeded the \$5,000 limitation for the partnership. Conversely, the four partners could individually give \$2,500 to a political committee and not be in violation of the Act since of the contributions would be less than the \$5,000 limit which the Act provides individuals may contribute to such committee.

#### FACTS

The Firm is an unincorporated general partnership law firm with offices in Houston and Dallas, Texas, and Washington, D. C.; the Committee is a multi-candidate political committee consisting of partners of the Firm and subject to the various requirements of the Act applicable to such committees. During the years involved in this case the number of partners of the Firm has grown from 47 to 62 at present. Only individuals are partners of the Firm, and during the years involved in this case all the partners in the Firm have been members of the Committee. Only partners in the Firm

are members of the Committee, and the Committee accepts contributions only from partners of the Firm.

Partners of the Firm have a percentage interest in the profits, cash distributions and capital of the Firm and are not employees. The Firm does employ non-partner lawyers, who are called associates. The Firm also employs non-lawyer personnel such as paralegals, accounting, secretarial and clerical staff, supervisory personnel, etc. At present, the Firm has approximately 255 employees in addition to the 62 partners.

The business of the Firm is controlled by the partners acting collectively. Weekly partnership meetings are held where Firm business is transacted. Where a Firm decision is required, necessary approval must be received on both a per capita basis and on a percentage basis. Some major decisions of the Firm require approval of 85 percent of the partners, both by percentage of ownership and per capita.

Since establishment of the Committee, the partners of the Firm have made individual contributions to the Committee pursuant to a voluntary check-off system by which they authorized amounts to be charged against their separate partner accounts and withheld from amounts to be distributed to them, and the amounts withheld to be transferred by the Firm to the Committee. From time to time, the Firm has issued Firm checks to the Committee in payment of the amounts withheld from the partners; these checks consisted of the total of the various individual contributions given by the partners.

In calendar year 1981, the Firm issued checks to the Committee in the total amount of \$27,500 constituting the total of the various voluntary contributions by individual members of the Firm for that year pursuant to the check-off system. In

calendar year 1982, the Firm issued checks to the Committee in the total amount of \$8,000; in calendar year 1983, the Firm issued checks to the Committee in the total amount of \$20,000; on March 15, 1984, the Firm issued a check to the Committee in the amount of \$10,000. Each of these checks likewise constituted the total of the various voluntary contributions by the individual partners pursuant to the check-off system. In none of the years in question did the contribution of any one partner exceed \$5,000. Indeed the largest contribution by any one partner in any of the years involved in this case was approximately \$1,000 by one partner in 1981 and the second largest individual contribution in any such years was less than \$600.

#### THE CHARGE

The Office of General Counsel claims that the Firm violated 2 U.S.C. § 441a(a)(1)(C) because the above described payments to the Committee were contributions by the Firm and exceeded the \$5,000 limit of 11 C.F.R. § 110.1(c) applicable to the Firm through 11 C.F.R. § 110.1(e)(3) in each of the years 1981, 1982, 1983 and 1984. Likewise, it claims that the Committee and Mr. Kyle as Treasurer violated 2 U.S.C. § 441a(f) because they "knowingly" accepted contributions from the Firm in excess of \$5,000 in each of the years 1981, 1982, 1983 and 1984. <sup>1/</sup>

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<sup>1/</sup> The Office of General Counsel also alleges that the Firm violated 2 U.S.C. § 441a(a)(1)(C) and that the Committee and Mr. Kyle violated 2 U.S.C. § 441a(f) because the value of unreimbursed administrative services provided by the Firm to the Committee exceeded the \$5,000 limitation. In informal discussions, the Office of General Counsel agreed with Respondents that the value of these services was not in excess of \$5,000 per year, and that if it was determined that the Firm, the Committee, and Mr. Kyle were not in violation of the Act with respect to the contributions transferred to the Committee by Firm check, they would not be in violation of the Act with respect to the value of the administrative services. Respondents concede that if the Office of General Counsel is correct in its contentions about the Firm checks, they are also in violation with respect to the value of the administrative services.



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The Office of General Counsel has not questioned that the Firm has a valid voluntary check-off arrangement by which the partners in the Firm have arranged to make voluntary contributions to the Committee by authorizing the Firm to charge their separate partnership accounts for their separate contributions, to withhold the amount of their separate contributions from the distributions paid to them, and to transmit such withheld amounts to the Committee. Counsel for Respondents have discussed the Firm's check-off system with the Office of the General Counsel and in the discussions the Office of General Counsel responded to the effect that the existence of a check-off system was irrelevant with respect to the issue of whether the use of Firm checks to transfer the sum of individual partners' contributions constituted a contribution by the Firm to the Committee.

The crux of the General Counsel's argument is that by virtue of using Firm checks to transfer the sum of the individual partners' contributions to the Committee, the Firm, as well as the individual partners, made a contribution to the Committee and that such contribution by the Firm was subject to the limitations of 11 C.F.R. § 110.1(c). The Office of General Counsel's brief against the Firm states (p. 6):

In this office's view, Andrews & Kurth's contention that it did not make excessive contributions to the Committee because the funds contributed to the Committee represent the individual contributions of the firm's consenting partners and not "contributions" from the partnership itself, is without merit. Andrews & Kurth has admitted that the contributions at issue were made with partnership checks drawn on the partnership account. Hence, not only do the contributions count against the individual contribution limitation of each of the firm's consenting partners, but the contributions count against the partnership's limitation as a separate entity and a "person" under the Act.

### ARGUMENT

Stripped to its essence the Office of General Counsel takes the position that even if a partnership has a valid check-off system by which the individual partners authorize the partnership to make deductions from their partnership accounts and to transmit the amounts deducted to a political committee, the partnership may not use a single check (or a series of checks) in excess of \$5,000 per year to transmit funds to a political committee, because the checks from the partnership constitute a contribution by the partnership that is in violation of the Act because a partnership is a "person" under 2 U.S.C. § 431(11), and a "person" may not contribute in excess of \$5,000 per year to a political committee. This position of the Office of General Counsel has no merit whatsoever. It (1) ignores the Commission's Advisory Opinion No. 1982-63 which clearly authorizes what the Firm did in this case; (2) fails to recognize that the Firm's payment of voluntarily withheld deductions under the check-off system was not a contribution by the partnership, but was solely a contribution by the individuals who authorized the deductions; (3) ignores analogous situations under the Act where payment of a check by one person to a political committee does not constitute a contribution by that person; and in particular ignores the fact that corporations and labor organizations are also "persons" under 2 U.S.C. § 431(11), and yet corporations and labor unions regularly make payments to political committees to transfer contributions made via check-off systems or payroll deduction plans and such payments are not contributions by the corporations or unions; and (4) exalts form over substance to a ridiculous level.

Even if the Firm violated the Act, there is no basis for a violation by the Committee or Kyle since they did not accept contributions "knowingly . . . in violation

of the Act." Moreover, Mr. Kyle did not accept any such contributions "for the benefit or use of a candidate," but instead accepted such contributions for the benefit or use of the Committee.

I. The Firm's transfer of checks totalling more than \$5,000 per year to the Committee did not violate the Act.

A. The Manatt, Phelps, Rothenberg & Tunney Advisory Opinion issued by the Commission clearly authorizes the procedure used by the Firm in this case.

This case is controlled by the Advisory Opinion the Commission issued to the law firm partnership of Manatt, Phelps, Rothenberg & Tunney, AO 1982-63, ("Manatt, Phelps AO") concerning the use of a check-off system to facilitate individual partners' contributions to a political committee established by the law firm. The Commission described the proposed Manatt, Phelps check-off system which it approved as follows:

Specifically, you propose to permit noncorporate partners to authorize the Firm to withhold a specified amount from their share of Firm profits and to transfer said amount directly to the PAC.

1 Fed. Election Camp. Fin. Guide (CCH) § 5704 at p. 10,948 (emphasis added). The Commission approved the check-off arrangement, stating:

"...the Commission concludes that the Firm may offer the described check-off PAC contribution system to its noncorporate partners. ...

Id. at p. 10,949.

In approving the check-off system which it described as providing that the Firm would "transfer said amount directly" to the political committee, the Commission in the Manatt, Phelps AO could not have approved of anything else but the use of a partnership check or checks to transfer the individual partners' contributions to the political committee. There would be no reason on earth to set up a check-off system if separate checks from the individual partners were to be issued.

Thus, it is noteworthy that the Commission in the Manatt, Phelps AO did not state that the partners' contributions withheld and transferred by the Manatt, Phelps firm to its political committee constituted a contribution by the partnership and thus were subject to the \$5,000 limitation of 11 C.F.R. § 110.1(e)(3). Moreover, the reports of receipts and disbursements filed with the Commission by the Manatt, Phelps political committee reveal that it received total contributions from the Manatt, Phelps partners of \$25,984 and \$21,740 in the years 1982 and 1983 respectively. If the individual Manatt, Phelps partners' contributions transferred to the political committee via partnership check had been contributions by the Manatt, Phelps firm as well as by the contributing partners, the Manatt, Phelps firm would have exceeded the \$5,000 per year restriction of 11 C.F.R. § 110.1(c) and § 110.1(e)(3) and thus violated the 2 U.S.C. § 441a(a)(1)(C) per "person" contribution limitation in each of these years; and moreover, the Manatt, Phelps political committee would have violated 2 U.S.C. § 441a(f) for accepting contributions in violation of § 441a(a)(1)(C). However, to Respondents' knowledge, no compliance proceeding has been initiated against Manatt, Phelps or its political committee.

Where a partnership has a check-off system, there are essentially two ways that the partnership could transfer the individual partners' contributions to a political committee. First, the partnership could transmit to the political committee from time to time a single partnership check, representing the sum of the individual partners' contributions for a particular period. This is what was done by the Firm in this case.

Second, the partnership could issue separate checks to the political committee for each of the individual partners' contributions as they were made



through the check-off system, i.e., the partnership would issue as many checks as there were partners contributing. The General Counsel can hardly take the position that the first procedure violates the Act and the second procedure does not since it seems monumentally silly to say that the partnership may properly issue a series of small checks to a committee totalling more than \$5,000 but cannot issue one check for the sum of such smaller checks; the only effect of such a procedure would be to increase the pieces of paper that the Firm would have to process. Moreover, a moment's analysis will show that this second procedure is no different than the first procedure, in that the partnership is issuing partnership checks for the amounts the individual partners have contributed and have had withheld from their distributions, and under the Office of General Counsel's theory in this case, if the sum of those checks exceeded \$5,000 the partnership would be in violation of the Act.

Thus, unless the arrangement approved in the Manatt, Phelps AO was limited to total contributions of less than \$5,000 per year by all the Manatt, Phelps partners together, there is no basis for the General Counsel's claim in this case that the Firm violated the Act. Since the Commission in its Manatt, Phelps AO did not make any such limitation on its approval, the decision clearly authorizes what the Firm did in this case.

- B. The amounts transmitted by the Firm to the Committee in this case were not contributions by the Firm but were only contributions by the individual partners.

The General Counsel claims that the payments by the Firm in this case exceed the limitations in 11 C.F.R. § 110.1(e)(3). However, 11 C.F.R. § 110.1(e) is applicable to "contributions by a partnership" and the validity of the General Counsel's claim depends on the payments in this case constituting "contributions by the



partnership." The General Counsel's brief cites the Manatt, Phelps AO, two other Advisory Opinions, AO 1981-50, and AO 1982-13, and Appendix D of the Commission's Campaign Guide in support of its conclusion that the payments in this case are contributions by the Firm. However, Appendix D does not discuss when a payment is a contribution by a partnership and merely sets forth the rules applicable to partnership contributions. As demonstrated above, the Manatt, Phelps AO stands for precisely the apposite conclusion than the one the General Counsel seeks. And AO 1981-50 (dated December 14, 1981) and AO 1982-13 (dated April 16, 1982) were both promulgated before the Manatt, Phelps AO, (dated February 10, 1983) and to the extent inconsistent may properly be regarded as implicitly overruled by the Manatt, Phelps AO. Also, the proper characterization of the partnership payments in AO 1981-50 and AO 1982-13 was not essential to the questions presented in those opinions. Finally, the situation in AO 1982-83 is fundamentally different from the situation in this case because the Firm in this case has a voluntary check-off system, while the firm in AO 1982-83 had no check-off system at all but rather an agreed upon in advance partnership total that was automatically charged to all partners on a proportionate basis and that all partners were required to participate in to the extent of their proportionate share.

As a general matter, payments made by one person do not necessarily constitute a "contribution" by that person. For example, a beneficiary of a trust may direct that the trustee make various payments from the income of the trust - such as a charitable contribution - and such payment is in fact and in law a charitable contribution by the beneficiary, not the trustee. Likewise payments made by an escrow agent holding funds will constitute a payment by the principal and not by the escrow agent.

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As set forth in C below, the Commission has clearly recognized that under the Act payments by one person do not necessarily constitute contributions by that person. In this case, the individual partners of the Firm authorized the Firm to deduct various amounts from their partnership accounts, to withhold such amounts from distributions made by the Firm to the partners, and to transmit the amounts withheld to the Committee. At the time the funds were transmitted to the Committee, such funds could not under any circumstances be considered Firm funds. They were funds belonging to the separate partners, in the amount of their separate contributions, that the Firm was holding for the account of the separate partners. Once such amounts had been withheld from a distribution properly payable to the partners, the Firm held such amounts as agent for the separate partners and could only disburse such amounts as authorized by each partner. In this case, the partners had each authorized the respective amounts withheld from their distribution to be paid to the Committee. But the payment to the Committee no more constituted a contribution by the Firm than the payment to a charity by a trustee at the direction of a beneficiary constitutes a charitable contribution by the trustee.

- C. The Commission has recognized a number of situations where a payment to a political committee by one person does not constitute a contribution by that person.

The basic premise of the General Counsel's charge is that issuance of a Firm check constitutes a contribution by the Firm. Yet in a number of situations under the Act, the fact that a check is issued by one person does not necessarily mean that the check constitutes a contribution by that person. For example, payments of withheld payroll deductions made by corporations and labor unions to political committees or separate segregated funds are not considered contributions by them. If

such payments were considered contributions by the corporation or union, a vast number of them would be in violation of the Act since they, like partnerships, are defined as "persons" under 2 U.S.C. 431(11) and thus are covered by the limitations on contributions by persons set forth in 2 U.S.C. § 441a(a)(1)(c), to say nothing of the prohibitions of 2 U.S.C. § 441b(a).

To be specific, a corporation may institute a check-off system or payroll deduction plan for its shareholders or executive or administrative personnel to contribute to its political committee, if it makes that method available to a labor union representing members working for the corporation. See 11 C.F.R. § 114.5(k)(1). Yet the corporation's transmittal of the amounts withheld under such a plan to a political committee or a separate segregated fund is not considered to be a contribution "by the corporation"; if it were, the corporation would be in violation of the law because contributions by corporations are illegal under 2 U.S.C. § 441b(a). (Moreover, although counsel for Respondents have not specifically investigated, it appears certain that a great many corporate payroll deduction plans transmit more than \$5,000 per year to political committees or separate segregated funds which under 11 C.F.R. § 114.5(f) are subject to the contribution limits for political committees. Thus, if payments of amounts withheld under a payroll deduction plan to a political committee or separate segregated fund constituted a contribution by a corporation, a number of corporations presumably would be in violation of 2 U.S.C. § 441a(a)(1)(c)) See AO 1978-23 and AO 1978-74 where the Commission approved corporate operated payroll deduction plans to facilitate contributions by union members to the union's PAC. See also 11 C.F.R. § 102.6(c)(3), which permits an employer (presumably a corporation) with a payroll deduction plan to:

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write a check on behalf of its employees to a union or its agent, which check represents a combined payment of voluntary contributions to the union's separate segregated fund and union dues or other employee deductions.

(emphasis added). Furthermore when an employer writes a check to a union for the payment of payroll deductions from union members for the union's PAC, the union may in turn write a check to the PAC transmitting such payment and such check from the union obviously does not constitute a contribution by it since it would violate 2 U.S.C. § 441b(a), and if the check is in excess of \$5,000 the union would also violate 2 U.S.C. § 441a(a)(1)(c). See AO 1978-98.

As another example, a corporation may make a payment for an individual by a corporate check and such payment is a contribution by the individual, not the corporation. See 11 C.F.R. § 102.6(c)(3): (emphasis supplied)

The check must be drawn on the contributor's personal checking account or on a non-repayable corporate drawing account of the individual contributor.

As still another example where payment by one person by check is not a contribution by that person, see AO 1980-11 which held that a spouse who has a checking account (which is not a joint checking account) may sign a check that is a contribution solely by the second spouse.

Thus, even though the payment to the Committee in this case was made by a Firm check, it was not a contribution by the Firm anymore than payments of withheld payroll deductions by corporations or unions to political committees constitute contributions by the corporations or unions, or payment of a contribution for one spouse through the checking account of the second spouse constitutes a contribution by the second spouse. The funds involved were not funds of the Firm; they were funds that had been withheld from distribution to the various partners, at



the authorization of those partners, and could only be disbursed pursuant to the instruction of the various partners.

- D. The General Counsel's position in this case is purely a matter of form over substance with no policy justification.

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The procedure followed by the Firm in this case is analogous in every significant respect to what corporations may properly do under the Act. The check-off plan was limited to partners who are the equivalent of stockholders, executive or administrative personnel. The amounts withheld pursuant to the check-off plan were transmitted by the Firm to the Committee in the same fashion as corporations transmit amounts withheld from valid corporate check-off plans. And the Committee is subject to essentially all the requirements applicable to a separate segregated fund, and indeed subject to more stringent requirements. Since corporations and partnerships are both defined as "persons" under the Act, and since the Act provides significantly greater restrictions on corporations than on partnerships, there is no policy justification for the General Counsel's position in this case which is based on the hollow formalism that a check written by a partnership must always be a contribution by the partnership.

The strained nature of the General Counsel's position can be seen in another way. Many law firms no longer use the partnership form, but rather have become professional corporations with the former partners becoming shareholders. Yet, such a professional corporation law firm could do exactly what the Firm did in this case without violation of the Act, and there seems little policy justification and no statutory justification to impose a more restrictive burden on law firm partnerships than on law firm professional corporations.



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Finally, there is no question that the Firm and the partners could have instituted the following procedure: (1) the individual partners could have decided to make contributions to the Committee in each of the years in question in this case in an amount equal to their share of a Firm distribution; (2) the partners could have directed the Firm to declare a special distribution in each of the years in question, in the amount of the checks the Firm actually issued to the Committee - i.e. \$27,500 in 1981; \$8,000 in 1982; etc. (3) the Firm would issue separate checks to the partners for their respective share of such special distributions; and (4) the partners could endorse such checks (or deposit them and write personal checks) to the Committee and could either send these checks to the Committee, or send them to the Firm to transmit to the Committee. What was done instead was that each of the partners of the Firm authorized the Firm to withhold a portion of regular distributions to the partners and authorized the Firm to transmit the total amounts withheld to the Committee. The only difference between the two situations is that the procedure actually followed required less paperwork and less paper shuffling than the hypothetical procedure would have required.

It seems strange indeed, and exalts form over substance to a ridiculous degree, for the General Counsel to claim that the procedure used by the Firm is in violation of the Act when exactly the same result could be achieved by the Firm and its partners engaging in some additional paper shuffling.

II. Neither the Committee nor Mr. Kyle "Knowingly" Accepted Contributions in Violation of the Act

In order to be in violation of 2 U.S.C. § 441a(f), a political committee or an officer or employee thereof must "knowingly" accept a contribution made in violation of the Act. Neither the Committee nor Mr. Kyle, "knowingly" accepted contributions in violation of the Act, and, therefore, neither is in violation of § 441a(f).

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Since all partners of the Firm are also members of the Committee, the Committee is in the position of having the knowledge that the partners had. As a partner in the Firm, Mr. Kyle knew that the Firm checks he received represented the sum of the contributions made to the Committee by his partners and himself. Also, as a partner in the Firm, Mr. Kyle was knowledgeable as to the amount that each partner had withheld from his or her distributions under the Firm's check-off plan. In light of the clear authorization of a law firm partnership check-off system in the Manatt, Phelps AO, it was reasonable for the Committee and Mr. Kyle to believe (at least until receipt of the April 10, 1984 Commission Determination of Reason to Believe) that receipt of Firm checks transmitting the amounts withheld from distributions to the partners did not violate the Act since they knew that the contributions by the individual partners were not in excess of the limit set by § 441a(a)(1)(C), and reasonably believed that the checks were not contributions by the Firm. Thus, neither Mr. Kyle nor the Committee violated 2 U.S.C. § 441a(f) by "knowingly" accepting contributions made in violation of the Act.

III. Mr. Kyle cannot be in violation of 2 U.S.C. § 441a(f).

Section 441a(f) states:

No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section. No officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures under this section.

(emphasis added). Mr. Kyle did not accept any contributions "made for the benefit or use of a candidate." Rather, Mr. Kyle accepted contributions made for the benefit or use of the Committee. Therefore, Mr. Kyle cannot be in violation of 2 U.S.C.

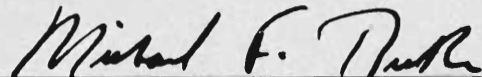
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§ 441a(f), because that section by its express terms does not apply to the activities of Mr. Kyle in performing his duties as Treasurer of the Committee.

**CONCLUSION**

Andrews & Kurth is not in violation of 2 U.S.C. § 441a(a)(1)(C), and neither Andrews, Kurth Lawyers for America Committee nor Jerry V. Kyle, as Treasurer, is in violation of 2 U.S.C. § 441a(f).

Respectfully submitted,



Michael F. Butler  
Donald F. Santa, Jr.  
Andrews & Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
(202) 861-7400

Attorneys for  
Andrews & Kurth; Andrews, Kurth Lawyers  
for America Committee, Jerry V. Kyle,  
as treasurer.

Dated: January 7, 1985



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 3, 1985

Michael Butler, Esquire  
Donald Santa, Jr., Esquire  
Andrews and Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 1669  
Andrews and Kurth; Andrews,  
Kurth Lawyers for America  
Committee and Jerry V.  
Kyle, as treasurer

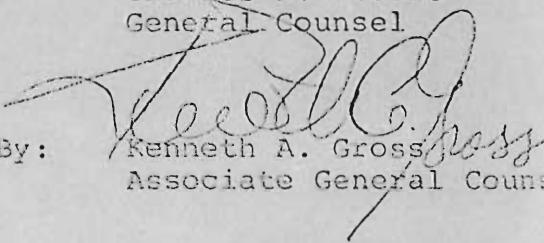
Dear Messrs. Butler and Santa:

This is in reference to your letter dated December 18, 1984, in which you request an additional extension of time until January 7, 1985, to respond to the General Counsels' Briefs in this matter. After considering the circumstances presented in your letter, the Commission has determined to grant your requested extension. Accordingly, your clients' responses will be due on January 7, 1985.

If you have any questions, please contact Maura White at 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

By:   
Kenneth A. Gross  
Associate General Counsel

85040530973

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Andrews and Kurth ) MUR 1669  
Andrews, Kurth Lawyers for )  
America Committee )  
Jerry V. Kyle, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 24, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1669:

1. Grant an extension of time to Andrews and Kurth, and Andrews, Kurth Lawyers for America Committee and its treasurer until January 7, 1985.
2. Approve the letter attached to the General Counsel's Memorandum to the Commission dated December 20, 1984.

Commissioners Aikens, Elliott, Harris, McGarry and Reiche voted affirmatively in this matter; Commissioner McDonald did not cast a vote.

Attest:

12-26-84

Date

Jody C. Ransom

for

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

12-20-84, 10:05  
12-20-84, 4:00

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cut*  
DATE: December 20, 1984  
SUBJECT: MUR 1669 - Memorandum to The Commission

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_

Open Session \_\_\_\_\_

Closed Session \_\_\_\_\_

CIRCULATIONS

48 Hour Tally Vote ☒ ]  
Sensitive ☒ ]  
Non-Sensitive ☐ ]

24 Hour No Objection ☐ ]  
Sensitive ☐ ]  
Non-Sensitive ☐ ]

Information ☐ ]  
Sensitive ☐ ]  
Non-Sensitive ☐ ]

Other ☐ ]

DISTRIBUTION

Compliance ☒ ]  
Audit Matters ☐ ]

Litigation ☐ ]  
Closed MUR Letters ☐ ]

Status Sheets ☐ ]  
Advisory Opinions ☐ ]

Other (see distribution below) ☐ ]

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**SENSITIVE**

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

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December 20, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

SUBJECT: MUR 1669 -- Request for  
Extension of Time

On November 14, 1984, two General Counsel's Briefs were mailed to counsel for Andrews and Kurth, and Andrews, Kurth Lawyers for America Committee and its treasurer. On November 16, 1984, counsel for the respondents requested a 20 day extension of time to respond to the General Counsels' Briefs. By letter dated November 23, 1984, this office advised counsel that the requested extension had been granted and that his clients' responses were due on December 24, 1984.

On December 18, 1984, this office received a request for a second extension in this matter until January 7, 1985 (Attachment 1). Counsel presents several compelling reasons as to why the extension should be granted, including the fact that counsel is out of the country, and that the requested extension should not unduly delay this matter because the extension runs from Christmas Eve until shortly after New Years Day.

Recommendation

Grant an extension of time to Andrews and Kurth, and Andrews, Kurth Lawyers for America Committee and its treasurer until January 7, 1985, and approve the attached letter.

Attachments:

- 1-Letter from Santa
- 2-Letter to Butler

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GCC# 6014

ANDREWS & KURTH

ATTORNEYS

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 861-7400

TELEX: 79-1208

TELECOPIER (202) 861-7437

TEXAS COMMERCE TOWER

HOUSTON, TEXAS 77002

(713) 220-4200

4400 THANKSGIVING TOWER

DALLAS, TEXAS 75201

(214) 978-4400

December 18, 1984

Lee Ann Elliott, Chairman  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: MUR No. 1669 In re Andrews & Kurth; Andrews, Kurth Lawyers for  
America Committee; Jerry V. Kyle, as treasurer

Dear Chairman Elliott:

On behalf of Andrews & Kurth; Andrews, Kurth Lawyers for America Committee; and Jerry V. Kyle, as treasurer of the Committee ("Respondents"), I hereby request an extension of time of fourteen days, until January 7, 1985, for Respondents to file their brief setting forth reasons why the Federal Election Commission ("Commission") should not find probable cause to believe that Respondents violated the Federal Election Campaign Act of 1971, as amended, and responding to arguments presented in the General Counsel's briefs of November 13, 1984. Respondents' brief is currently due on December 24, 1984, pursuant to an extension of time granted by the Office of General Counsel ("OGC") on November 23, 1984, for due cause shown.

Late on the afternoon of Monday, December 17, 1984, counsel for Respondents, Michael F. Butler, received a telephone call from a major client of this firm regarding an urgent matter which needed Mr. Butler's immediate attention. This unanticipated development made it necessary for Mr. Butler to fly to Paris, France that evening to consult with his client and then to fly with his client to Rio de Janeiro, Brazil. This matter will necessitate Mr. Butler's absence from the United States through the filing date of Respondents' brief. Upon finding out that he would be leaving the country, Mr. Butler telephoned OGC to request an extension of time for the filing of Respondents' brief. Mr. Butler spoke to Ms. Lois Lerner, who informed him that OGC was not authorized to grant second extensions and that applications for such extensions had to be made directly to the Commission. It is pursuant to Ms. Lerner's advice that the instant application is being made.

During December, Mr. Butler has been occupied representing several major clients of this firm involved in corporate merger activity. However, Mr. Butler

Attachment 1 (1)

85040530977

Lee Ann Elliott  
December 18, 1984  
Page Two

devoted time to the preparation of Respondents' brief, including time over the weekend immediately preceding his departure overseas. Respondents' brief is currently in the form of a preliminary draft, which Mr. Butler took with him to work on while he is overseas. However, because Mr. Butler will be on a virtually non-stop work schedule while he is away and because he will not have secretarial assistance on hand during this period, it will be extraordinarily difficult to revise the draft brief. Had Mr. Butler not been summoned overseas on this matter, Respondents' brief surely would have been filed well in advance of the December 24, 1984 deadline.

Because this proceeding directly affects this firm, it is important that a partner of this firm work on Respondents' brief. Mr. Butler is the partner of this firm who has the most intimate knowledge of the facts and the law at issue in this proceeding. Therefore, Mr. Butler's expertise is essential to the preparation of Respondents' brief.

Respondents recognize that the Commission does not treat lightly applications for second extensions. As described above, the circumstances which necessitate this application for extension were truly unanticipated, and nothing could have been done to alter the course of events. Respondents guarantee that this is the last application for extension they will make, and that their brief will be timely filed pursuant to this extension. Respondents submit that granting this extension will not cause any undue delay or prejudice to the parties involved in this proceeding, because the extension requested will run from Christmas Eve until shortly after New Year's Day, a period in which there are very few working days that Commission staff might have used to review Respondents' brief. For all of the above reasons, Respondents request that the Commission exercise its discretion and grant Respondents an extension of time until January 7, 1985 within which to file their brief.

Respectfully submitted,

*Donald F. Santa, Jr.*

Donald F. Santa, Jr.  
Attorney for  
Andrews & Kurth; Andrews, Kurth Lawyers  
for America Committee; and Jerry V.  
Kyle, as treasurer

DFS/crw

1(2)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Michael Butler, Esquire  
Donald Santa, Jr., Esquire  
Andrews and Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 1669  
Andrews and Kurth; Andrews,  
Kurth Lawyers for America  
Committee and Jerry V.  
Kyle, as treasurer

Dear Messrs. Butler and Santa:

This is in reference to your letter dated December 18, 1984, in which you request an additional extension of time until January 7, 1985, to respond to the General Counsels' Briefs in this matter. After considering the circumstances presented in your letter, the Commission has determined to grant your requested extension. Accordingly, your clients' responses will be due on January 7, 1985.

If you have any questions, please contact Maura White at 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Attachment 2

85040530979



GLC# 6014

ANDREWS & KURTH

ATTORNEYS

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 861-7400

TELEX: 79-1208

TELECOPIER (202) 861-7437

December 18, 1984

TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200

MUR 4400 THANKSGIVING TOWER  
DALLAS, TEXAS 75201  
(214) 879-4400  
1669  
white

Lee Ann Elliott, Chairman  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: MUR No. 1669 In re Andrews & Kurth; Andrews, Kurth Lawyers for  
America Committee; Jerry V. Kyle, as treasurer

Dear Chairman Elliott:

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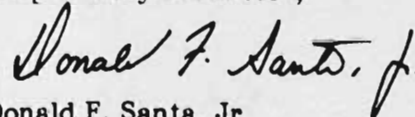
Lee Ann Elliott  
December 18, 1984  
Page Two

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Respectfully submitted,



Donald F. Santa, Jr.  
Attorney for

Andrews & Kurth; Andrews, Kurth Lawyers  
for America Committee; and Jerry V.  
Kyle, as treasurer

DFS/crw

35040530931

**ANDREWS & KURTH**

ATTORNEYS

1747 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D. C. 20006

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Lee Ann Elliott, Chairman  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

GCC#5411

White

ANDREWS & KURTH  
ATTORNEYS  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006  
(202) 861-7400  
TELEX: 79-1208  
TELECOPIER (202) 861-7437

TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200

4400 THANKSGIVING TOWER  
DALLAS, TEXAS 75201  
(214) 978-4400

October 30, 1984

34 OCT 30 P 2: 55

GENERAL COUNSEL

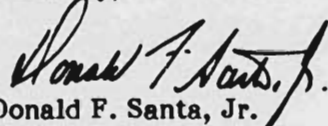
Office of General Counsel  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: MUR 1669 In re Andrews & Kurth; Andrews, Kurth Lawyers for  
America Committee; Jerry V. Kyle, as treasurer

Dear Sir or Madam:

In accordance with 11 C.F.R. § 111.23, attached please find three copies of Statement of Designation of Counsel, designating Michael F. Butler as counsel for the parties named in the above-captioned proceeding. As stated on the designations, the parties request that the Commission continue to send copies of notifications and communications directly to them as well as to Mr. Butler. Id. at § 111.23(b). Thank you.

Cordially,

  
Donald F. Santa, Jr.

cc: Michael F. Butler, Esq.  
Clinton F. Morse, Esq.  
Jerry V. Kyle, Esq.

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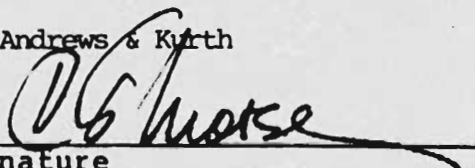
STATEMENT OF DESIGNATION OF COUNSEL

MUR 1669  
NAME OF COUNSEL: Michael F. Butler, Esq.  
ADDRESS: Andrews & Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
TELEPHONE: (202) 861-7414

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. \*

For Andrews & Kurth

October 29, 1984  
Date

  
Signature  
Clinton F. Morse,  
Administrative Partner

RESPONDENT'S NAME: Andrews & Kurth  
ADDRESS: 4200 Texas Commerce Tower  
Houston, Texas 77002  
HOME PHONE: -----  
BUSINESS PHONE: (713) 220-4350

\* Please continue to send copies of notifications and other communications from the Commission to Andrews & Kurth as well as to the firm's designated counsel, Michael F. Butler.



STATEMENT OF DESIGNATION OF COUNSEL

MUR 1669

NAME OF COUNSEL: Michael F. Butler, Esq.

ADDRESS: Andrews & Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

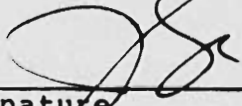
TELEPHONE: (202) 861-7414

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. \*

For Andrews, Kurth Lawyers for America Committee,

October 29, 1984

Date

  
Signature  
Jerry V. Kyle, Treasurer

RESPONDENT'S NAME: Andrews, Kurth Lawyers for America Committee

ADDRESS: c/o Jerry V. Kyle, Esq.  
4200 Texas Commerce Tower  
Houston, Texas 77002

HOME PHONE: -----

BUSINESS PHONE: (713) 220-4356

\* Please continue to send copies of notifications and communications from the  
Commission to Andrews, Kurth Lawyers for America Committee as well as to its  
designated counsel, Michael F. Butler.

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1669


NAME OF COUNSEL: Michael F. Butler, Esq.

ADDRESS: Andrews & Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

TELEPHONE: (202) 861-7414

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.\*

October 29, 1984  
Date

  
\_\_\_\_\_  
Signature  
Jerry V. Kyle, Treasurer  
Andrews, Kurth Lawyers for America Committee

RESPONDENT'S NAME: Jerry V. Kyle

ADDRESS: Andrews & Kurth  
4200 Texas Commerce Tower  
Houston, Texas 77002

HOME PHONE: -----

BUSINESS PHONE: (713) 220-4356

\* Please continue to send copies of notifications and communications from the  
Commission to me as well as to my designated counsel, Michael F. Butler.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 23, 1984

Donald F. Santa, Jr., Esquire  
Andrews and Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 1669

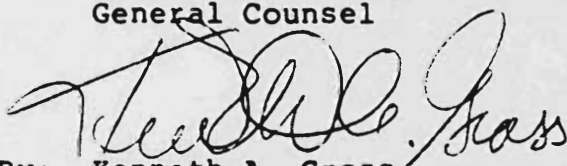
Dear Mr. Santa:

This is in response to your letter dated November 16, 1984, in which you request a 20 day extension of time to respond to the General Counsel's Briefs concerning your clients: Andrews and Kurth; Andrews, Kurth Lawyers for America Committee; and, Jerry V. Kyle, as treasurer.

I have reviewed your request and agree to the extension. The responses of your clients are due, therefore, on December 24, 1984. If you have any questions, please contact Maura White at 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

05040530937

ANDREWS & KURTH

ATTORNEYS

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 861-7400

TELEX: 79-1208

TELECOPIER (202) 861-7437

RECEIVED AT THE FEC

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34 NOV 16 P 3: 37

TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200

4400 THANKSGIVING TOWER  
DALLAS, TEXAS 75201  
(214) 979-4400

November 16, 1984

Charles N. Steele, Esquire  
General Counsel  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: MUR No. 1669 In re Andrews & Kurth; Andrews, Kurth Lawyers for  
America Committee; Jerry V. Kyle, as treasurer

Dear Mr. Steele:

In your letter to Michael Butler of November 14, 1984 concerning the above-captioned proceeding, you stated that the above-named Respondents had fifteen (15) days from the receipt of your letter to file briefs in reply to the briefs of the General Counsel. Pursuant to the Commission's regulations, three (3) days shall be added to the prescribed period for reply when service is made by mail. 11 C.F.R. § 111.2(c). General Counsel's briefs were dated November 13, 1984. Therefore, Respondents' reply briefs are due on December 3, 1984. See, id. at § 111.2(2).

In your letter, you state that if Respondents are unable to file responsive briefs within the fifteen day period allotted, they may request an extension of time of up to twenty (20) days within which to file the briefs. On behalf of Respondents, I hereby request an extension of twenty days until December 24, 1984 within which to file Respondents' briefs. The reason for this extension is the work load and travel plans of Respondents' counsel, Michael Butler. Business commitments require that Mr. Butler be out of his office, and possibly out of the country, for much of the fifteen day period that Respondents have to file their briefs. Combined with the intervening Thanksgiving holiday, it would be extremely difficult to prepare Respondents' briefs for filing on December 3, 1984. Given the importance of presenting Respondents' position to the Commission, an extension of twenty days is warranted. Furthermore, granting such an extension will not prejudice to the Commission or the General Counsel. In order to permit counsel to prepare Respondents' pleadings in the event that this extension is denied, a prompt response to this request for extension would be greatly appreciated.

Very truly yours,

*Donald F. Santa, Jr.*

Donald F. Santa, Jr.

Attorney for

Andrews & Kurth, Andrews, Kurth Lawyers  
for America Committee, and Jerry V. Kyle

DFS/crw

cc: Clinton F. Morse, Esquire  
Jerry V. Kyle, Esquire  
Michael F. Butler, Esquire

8 5 0 4 0 5 3 0 9 8 7

**ANDREWS & KURTH**

ATTORNEYS

1747 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D. C. 20006

Maura White  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
7th Floor  
Washington, D.C. 20463





# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

## MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cut*  
DATE: November 14, 1984  
SUBJECT: MUR 1669 - Memorandum and General Counsel's Briefs

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_

Open Session \_\_\_\_\_

Closed Session \_\_\_\_\_

### CIRCULATIONS

48 Hour Tally Vote	[ ]
Sensitive	[ ]
Non-Sensitive	[ ]
24 Hour No Objection	[ ]
Sensitive	[ ]
Non-Sensitive	[ ]
Information	[X]
Sensitive	[X]
Non-Sensitive	[ ]

Other [ ]

### DISTRIBUTION

Compliance	[X]
Audit Matters	[ ]
Litigation	[ ]
Closed MUR Letters	[ ]
Status Sheets	[ ]
Advisory Opinions	[ ]

Other (see distribution below) [ ]

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEC  
SECRETARY  
NOV 14 1984

November 14, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel *CS*

SUBJECT: MUR 1669

Attached for the Commission's review are two briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of each brief and a letter notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on November 14, 1984. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

1. Briefs (2)
2. Letter to respondent

85040530971

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Andrews, Kurth Lawyers for America ) MUR 1669  
Committee; Jerry V. Kyle, as treasurer )

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The instant matter was referred to the Office of the General Counsel by the Reports Analysis Division ("RAD"). Reports filed by the Andrews, Kurth Lawyers for America Committee ("Committee") disclosed the receipt of \$27,500 from Andrews and Kurth during 1981, \$8,000 during 1982, \$20,000 during 1983, and \$10,000 during 1984. 1/

Andrews and Kurth is the connected organization of the Committee and a law firm comprised of numerous partners. On October 5, 1983, a Request for Additional Information ("RFAI") was mailed to the Committee. The RFAI advised the Committee to refund the amount it received from Andrews and Kurth in excess of

1/ The following chart lists each of the contributions accepted by the Committee from Andrews and Kurth during the above-mentioned years:

<u>Date</u>	<u>Amounts</u>
04/10/81	\$ 7,500
10/23/81	\$10,000
11/03/81	\$10,000
06/03/82	\$ 6,000
09/17/82	\$ 2,000
04/21/83	\$10,000
10/13/83	\$ 5,000
11/30/83	\$ 5,000
03/15/84	\$10,000

\$5,000 per calendar year. 2/ On October 27, 1983, a second notice was mailed to the Committee, the same day that the Committee submitted its response to the RFAI of October 5, 1983.

8 5 0 4 0 5 3 0 9 9 3  
The response submitted by the Committee states that it is a "PAC consisting of all of the partners in the law firm" and that "[e]ach of the partners has agreed and does contribute equally to the PAC." According to the response submitted, "funds are received by the PAC from time to time by one single check drawn on partnership funds, and then each individual partner's distribution account is charged for his or her equal contribution, which has been agreed to by each partner." The response continues on to state that between 1981 and 1983 the number of partners has "varied from not less than 47 and at present there are 53 partners." The response concludes that "the amount involved for each individual is relatively modest and well below any ceiling in any respective calendar year or for any particular election," and that "in the future we will be careful to identify on the reports that any deposits are from the partners in the law firm."

---

2/ The RFAI specifically referenced the Committee's 1981 Mid-Year and Year-End Reports, as well as the 1982 July and October Quarterly Reports. The RFAI also informed the Committee that contributions from Andrews and Kurth are attributable "to each person based upon their percentage of ownership of the firm," but that any other formula may be used, and that each "person who has contributed in excess of \$200 since January 1 should be identified by name, address, name of employer, amount of contribution, and aggregate total."

8 5 0 4 0 5 3 0 9 9 1  
In response to a telephone conversation with a staff member of RAD, the Committee submitted further information on January 26, 1984. The Committee's letter stated that the "law firm partnership as a partnership and as an entity has [sic] and does not contribute to this PAC; rather all of its partners . . . have contributed and do contribute to the PAC." Accompanying the Committee's letter was a list of all of the partners in Andrews and Kurth which purportedly represents "all of the members of and contributors to the PAC since its inception in the calendar year 1978 through the calendar year 1983." 3/

On April 10, 1984, the Federal Election Commission determined that there is reason to believe the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totalling \$40,500 from Andrews and Kurth during the period of 1981 through 1983. Notification of the Commission's finding was mailed to the Committee and its treasurer on April 12, 1984. The Committee submitted a response to the Commission's finding on April 30, 1984.

In response to the Commission's finding in this matter, the Committee argues that although "the term 'person' is defined at 2 U.S.C. § 431(11) to include a partnership," the Commission's regulations at 11 C.F.R. § 110.1(e) "provide that a contribution

---

3/ The information submitted by the Committee indicates that between 1978 and 1983 the number of partners contributing to the Committee varied from 36 to 53. Each partner was identified by name, business address, and year of their contributions.



by a partnership shall be attributed to each partner in accordance with an agreement of the partners provided that the partnership profits are reduced in proportion to the contribution attributed to each of them." The Committee's response further asserts that "[i]f 11 C.F.R. § 110.1(e) is complied with and a partnership contribution is attributed to each of the partners as therein set forth, the contribution would not also be attributed to the partnership as an entity." It is the contention of the Committee that "[t]he purpose of the attribution rules in the regulations is to permit a partnership to attribute a partnership contribution to each of its partners only if the regulations are satisfied," and that "[t]here is no provision in the statute or the regulations which indicate a contribution will be counted twice or attributed to more than one 'person'." The Committee concludes its response by stating the additional argument that "while a partnership check was used for making the contribution to the Committee, the check represented a contribution by the firm as agent for each of the contributing partners."

On June 22, 1984, the Commission determined that there is reason to believe the Committee and Jerry V. Kyle, as treasurer, further violated 2 U.S.C. § 441a(f) by accepting a contribution from Andrews and Kurth on March 15, 1984, which exceeded the contribution limitation by \$5,000. 3/ The Commission also

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3/ The Committee's 1984 April Quarterly Report disclosed the receipt of \$10,000 from Andrews and Kurth on March 15, 1984.

determined at this time that there is reason to believe the Committee further violated 2 U.S.C. § 441a(f) by accepting the payment of its operating and solicitation costs from Andrews and Kurth from 1981 through 1984. The Commission's finding was based upon the fact that during 1981-1984 the Committee had not reported any operating (e.g., use of facilities) or solicitation costs whatsoever, and upon the fact that the Committee resides at the same address as Andrews and Kurth.

• (a) The applicable law

The term "person" is defined at 2 U.S.C. § 431(11) to include an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons, but such term does not include the Federal

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Government or any authority of the Federal Government.

Pursuant to 2 U.S.C. § 441a(a)(1)(C) no person shall make contributions to a political committee in any calendar year which, in the aggregate, exceed \$5,000 per calendar year. As set forth at 2 U.S.C. § 441a(f) no political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 441a.

The Commission's regulations at 11 C.F.R. § 110.1(e) state that a contribution by a partnership shall: (1) be attributed to each partner in direct proportion to his or her share of the partnership profits, according to instructions which shall be provided by the partnership to the committee or candidate; or (2) be attributed by agreement of the partners, as long as (i) only the profits of the partners to whom the contribution is attributed are reduced (or losses increased), and (ii) these partners' profits are reduced (or losses increased) in proportion to the contribution attributed to each of them; and, (3) not exceed the limits of § 110.1(a), (b), and (c).

(b) Application of the law to the facts

The evidence in hand indicates that the Committee and its treasurer have violated 2 U.S.C. § 441a(f) during 1981, 1982, 1983, and 1984 by accepting excessive contributions totalling \$45,500 from a partnership, Andrews and Kurth. In this office's view, the Committee's contention that it did not accept excessive

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contributions from the partnership, Andrews and Kurth, because the funds contributed to the Committee represent the individual contributions of the firm's consenting partners and not "contributions" from the partnership itself, is without merit. The Committee has admitted that the contributions at issue were made with partnership checks drawn on the partnership account. Hence, not only do the contributions count against the individual contribution limitation of each of the firm's consenting partners, but the contributions count against the partnership's limitation as a separate entity and a "person" under the Act. See Advisory Opinions 1981-50, 1982-13, and 1982-63, and Appendix D of the Federal Election Commission Campaign Guide for Non-Connected Committees. The Committee's insistence that there is no provision in the regulations or the statute which indicates that a contribution drawn on partnership funds is attributable to both the partnership and the consenting partners ignores the clear language of the regulations and the statute. Section 110.1(e)(3) of Title 11, Code of Federal Regulations, specifically states that a contribution by a partnership shall not exceed the contribution limitations (see 11 C.F.R. § 110.1(c) and 2 U.S.C. § 441a(a)(1)(C)) and shall be attributable to the partners (see 11 C.F.R. § 110.1(e)(1) and (2)). Moreover, the term "person" is defined under the Act to include a partnership, and no person may make contributions to a political committee which aggregate in excess of \$5,000 per calendar year. See

1(7)

2 U.S.C. § 431(11) and § 441a(a)(1)(C). In view of the fact that the Committee accepted \$27,500, \$8,000, \$20,000, and \$10,000 from Andrews and Kurth during 1981, 1982, 1983, and 1984, respectively, it is the recommendation of the Office of the General Counsel that there is probable cause to believe the Andrews, Kurth Lawyers for America Committee violated 2 U.S.C. § 441a(f).

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In addition to the direct contribution of funds from Andrews and Kurth to the Committee discussed supra, the Office of General Counsel notes that during the years in question herein (1981-1984) the Committee has not reported any solicitation or operating costs (e.g., use of facilities, supplies, staff time) whatsoever. It has been confirmed through the Committee's treasurer that Andrews and Kurth absorbed the Committee's operating and solicitation costs during these years. Although the Committee may accept the payment of these costs from Andrews and Kurth, such costs constitute in-kind contributions to the Committee from Andrews and Kurth, which are subject to an annual limitation of \$5,000 per calendar year. See 2 U.S.C. §§ 441a(a)(1)(C) and 441a(f). Because the Committee does not constitute a separate segregated fund under 2 U.S.C. § 441b(b)(2), the Committee may not receive unlimited in-kind contributions from Andrews and Kurth for the expenses relating to the administration and solicitation of contributions to the Committee. See Advisory

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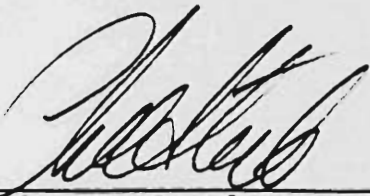
Opinion 1982-63 and California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981). In that from 1981 through 1984 the Committee accepted direct monetary contributions from Andrews and Kurth in excess of \$5,000 per calendar year, the Committee's further acceptance of the payment of its administrative and solicitation costs by Andrews and Kurth constitutes additional excessive contributions in violation of 2 U.S.C. § 441a(f), in the view of this office.

**III. General Counsel's Recommendation**

Find probable cause to believe the Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).

Date

13 November 1984

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

1(9)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Andrews and Kurth

)  
)  
) MUR 1669

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The instant matter was referred to the Office of the General Counsel by the Reports Analysis Division ("RAD"). Reports filed by the Andrews, Kurth Lawyers for America Committee ("Committee") disclosed the receipt of \$27,500 from Andrews and Kurth during 1981, \$8,000 from Andrews and Kurth during 1982, \$20,000 from Andrews and Kurth during 1983, and \$10,000 from Andrews and Kurth during 1984. 1/

Andrews and Kurth is the connected organization of the Committee and a law firm comprised of numerous partners. On October 5, 1983, a Request for Additional Information ("RFAI") was mailed to the Committee. The RFAI advised the Committee to refund the amount it received from Andrews and Kurth in excess of

1/ The following chart lists each of the contributions accepted by the Committee from Andrews and Kurth during the above-mentioned years:

<u>Date</u>	<u>Amount</u>
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03/15/84	\$10,000

1(10)

\$5,000 per calendar year. 2/ On October 27, 1983, a second notice was mailed to the Committee, the same day that the Committee submitted its response to the RFAI of October 5, 1983.

The response submitted by the Committee states that it is a "PAC consisting of all of the partners in the law firm" and that "[e]ach of the partners has agreed and does contribute equally to the PAC." According to the response submitted, "funds are received by the PAC from time to time by one single check drawn on partnership funds, and then each individual partner's distribution account is charged for his or her equal contribution, which has been agreed to by each partner." The response continues on to state that between 1981 and 1983 the number of partners has "varied from not less than 47 and at present there are 53 partners." The response concludes that "the amount involved for each individual is relatively modest and well below any ceiling in any respective calendar year or for any particular election," and that "in the future we will be careful to identify on the reports that any deposits are from the partners in the law firm."

---

2/ The RFAI specifically referenced the Committee's 1981 Mid-Year and Year-End Reports, as well as the 1982 July and October Quarterly Reports. The RFAI also informed the Committee that contributions from Andrews and Kurth are attributable "to each person based upon their percentage of ownership of the firm," but that any other formula may be used, and that each "person who has contributed in excess of \$200 since January 1 should be identified by name, address, name of employer, amount of contribution, and aggregate total."

In response to a telephone conversation with a staff member of RAD, the Committee submitted further information on January 26, 1984. The Committee's letter stated that the "law firm partnership as a partnership and as an entity has [sic] and does not contribute to this PAC; rather all of its partners . . . have contributed and do contribute to the PAC." Accompanying the Committee's letter was a list of all of the partners in Andrews and Kurth which purportedly represents "all of the members of and contributors to the PAC since its inception in the calendar year 1978 through the calendar year 1983." 3/

On April 10, 1984, the Federal Election Commission determined that there is reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C) by making excessive contributions totalling \$40,500 to the Committee during the period of 1981 through 1983. Notification of the Commission's finding was mailed to Andrews and Kurth on April 12, 1984. Andrews and Kurth submitted a response to the Commission's finding on April 30, 1984.

In response to the Commission's finding in this matter, Andrews and Kurth argues that although "the term 'person' is

---

3/ The information submitted by the Committee indicates that between 1978 and 1983 the number of partners contributing to the Committee varied from 36 to 53. Each partner was identified by name, business address, and year of their contributions.

defined at 2 U.S.C. § 431(11) to include a partnership," the Commission's Regulations at 11 C.F.R. § 110.1(e) "provide that a contribution by a partnership shall be attributed to each partner in accordance with an agreement of the partners provided that the partnership profits are reduced in proportion to the contribution attributed to each of them." The response of Andrews and Kurth further asserts that "[i]f 11 C.F.R. § 110.1(e) is complied with and a partnership contribution is attributed to each of the partners as therein set forth, the contribution would not also be attributed to the partnership as an entity." It is the contention of Andrews and Kurth that "[t]he purpose of the attribution rules in the regulations is to permit a partnership to attribute a partnership contribution to each of its partners only if the regulations are satisfied," and that "[t]here is no provision in the statute or the regulations which indicate a contribution will be counted twice or attributed to more than one 'person'." Andrews and Kurth concludes its response by stating the additional argument that "while a partnership check was used for making the contribution to the Committee, the check represented a contribution by the firm as agent for each of the contributing partners."

On June 22, 1984, the Commission determined that there is reason to believe Andrews and Kurth further violated 2 U.S.C. § 441a(a)(1)(C) by contributing \$5,000 in excess of the



contribution limitation to the Committee on March 15, 1984. 4/  
The Commission also determined at this time that there is reason  
to believe Andrews and Kurth further violated 2 U.S.C.

§ 441a(a)(1)(C) by paying the operating and solicitation costs of  
the Committee from 1981 through 1984. The Commission's finding  
was based upon the fact that during 1981-1984 the Committee had  
not reported any operating or solicitation costs whatsoever, and  
upon the fact that the Committee resides at the same address as  
Andrews and Kurth.

## II. Legal Analysis

- (a) The applicable law

The term "person" is defined at 2 U.S.C. § 431(11) to  
include an individual, partnership, committee, association,

---

4/ The Committee's 1984 April Quarterly Report disclosed the  
receipt of \$10,000 from Andrews and Kurth on March 15, 1984.

corporation, labor organization, or any other organization or group of persons, but such term does not include the Federal Government or any authority of the Federal Government.

Pursuant to 2 U.S.C. § 441a(a) (1) (C) no person shall make contributions to a political committee in any calendar year which, in the aggregate, exceed \$5,000 per calendar year. As set forth at 2 U.S.C. § 441a(f) no political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 441a.

The Commission's regulations at 11 C.F.R. § 110.1(e) state that a contribution by a partnership shall: (1) be attributed to each partner in direct proportion to his or her share of the partnership profits, according to instructions which shall be provided by the partnership to the committee or candidate; or (2) be attributed by agreement of the partners, as long as (i) only the profits of the partners to whom the contribution is attributed are reduced (or losses increased), and (ii) these partners' profits are reduced (or losses increased) in proportion to the contribution attributed to each of them; and, (3) not exceed the limits of § 110.1(a), (b), and (c).

(b) Application of the law to the facts

The evidence in hand indicates that Andrews and Kurth has violated 2 U.S.C. § 441a(a) (1) (C) during 1981, 1982, 1983, and 1984 by contributing \$45,500 in excess of the contribution limitation to the Committee. In this office's view, Andrews and Kurth's contention that it did not make excessive contributions

to the Committee because the funds contributed to the Committee represent the individual contributions of the firm's consenting partners and not "contributions" from the partnership itself, is without merit. Andrews and Kurth has admitted that the contributions at issue were made with partnership checks drawn on the partnership account. Hence, not only do the contributions count against the individual contribution limitation of each of the firm's consenting partners, but the contributions count against the partnership's limitation as a separate entity and a "person" under the Act. See Advisory Opinions 1981-50, 1982-13, and 1982-63, and Appendix D of the Federal Election Commission Campaign Guide for Non-Connected Committees. Andrews and Kurth's insistence that there is no provision in the regulations or the statute which indicates that a contribution drawn on partnership funds is attributable to both the partnership and the consenting partners ignores the clear language of the regulations and the statute. Section 110.1(e)(3) of Title 11, Code of Federal Regulations, specifically states that a contribution by a partnership shall not exceed the contribution limitations (see 11 C.F.R. § 110.1(c) and 2 U.S.C. § 441a(a)(1)(C)) and shall be attributable to the partners (see 11 C.F.R. § 110.1(e)(1) and (2)). Moreover, the term "person" is defined under the Act to include a partnership, and no person may make contributions to a political committee which aggregate in excess of \$5,000 per calendar year. See 2 U.S.C. § 431(11) and § 441a(a)(1)(C). In

view of the fact that Andrews and Kurth contributed \$27,500, \$8,000, \$20,000, and \$10,000 to the Committee during 1981, 1982, 1983, and 1984, respectively, it is the recommendation of the Office of the General Counsel that there is probable cause to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C).

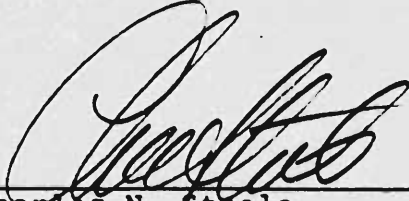
In addition to the direct contribution of funds from Andrews and Kurth to the Committee discussed supra, the Office of General Counsel notes that during the years in question herein (1981-1984) the Committee has not reported any solicitation or operating costs (e.g., use of facilities, supplies, staff time) whatsoever. It has been confirmed through the Committee's treasurer that Andrews and Kurth absorbed the Committee's operating and solicitation costs during these years. Although the Committee may accept the payment of these costs from Andrews and Kurth, such costs constitute in-kind contributions to the Committee from Andrews and Kurth, which are subject to an annual limitation of \$5,000 per calendar year. See 2 U.S.C. §§ 441a(a)(1)(C) and 441a(f). Because the Committee does not constitute a separate segregated fund under 2 U.S.C. § 441b(b)(2), the Committee may not receive unlimited in-kind contributions from Andrews and Kurth for the expenses relating to the administration and solicitation of contributions to the Committee. See Advisory Opinion 1982-63 and California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981). In that from 1981 through 1984 Andrews and Kurth made direct monetary contributions

to the Committee in excess of \$5,000 per calendar year, the payment of the Committee's administrative and solicitation costs by Andrews and Kurth constitutes additional excessive contributions in violation of 2 U.S.C. § 441a(a)(1)(C), in the view of this office.

**III. General Counsel's Recommendation**

Find probable cause to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C).

13 November 1984  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

85040531002

1(18)





FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

November 14, 1984

Michael Butler, Esquire  
Andrews and Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Re: MUR 1669  
Andrews Kurth Lawyers for  
America Committee,  
Jerry V. Kyle, as treasurer;  
Andrews and Kurth

Dear Mr. Butler:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients, Andrews and Kurth, Andrews, Kurth Lawyers for America Committee ("Committee"), and Jerry V. Kyle, as treasurer, the Federal Election Commission, on April 10, 1984, found reason to believe the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f), and that Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C). The Commission then instituted an investigation in this matter. On June 22, 1984, the Commission further determined that there is reason to believe the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f), and that Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C).

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred. Submitted for your review are two briefs stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission briefs (10 copies if possible) stating your position on the issues and replying to the briefs of the General Counsel. (Three copies of each brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

2(1)

Letter to Michael Butler  
Page 2

If you are unable to file responsive briefs within 15 days, you may submit a written request to the Commission for an extension of time in which to file the briefs. The Commission will not grant any extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30 days, but not more than 90, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Maura White, the staff member assigned to handle this matter, at (202) 523-4143.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure  
Briefs (2)

cc: Andrews and Kurth  
Andrews and Kurth Lawyers for  
America Committee

2(2)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 26, 1984

Charles E. Curbo  
Andrews and Kurth  
Texas Commerce Tower  
Houston, Texas 77002

RE: MUR 1669  
Andrews and Kurth

Dear Mr. Curbo:

On June 22, 1984, the Federal Election Commission determined that there is reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Andrews and Kurth. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against Andrews and Kurth, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

35040531012

Letter to Charles E. Curbo  
Page 2

If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

*Lee Ann Elliott*  
Lee Ann Elliott  
Chairman

Enclosure  
General Counsel's Factual and Legal Analysis

85040531013

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1669

RESPONDENTS: Andrews and Kurth

On April 10, 1984, the Commission determined that there is reason to believe a partnership, Andrews and Kurth, violated 2 U.S.C. § 441a(a)(1)(C) by making excessive contributions totalling \$40,500 to the Andrews, Kurth, Lawyers for America Committee ("Committee") during the period of 1981 through 1983. The respondents were notified of the Commission's findings by letters dated April 12, 1984. A response was submitted on April 30, 1984.

(a) Direct Partnership Contributions

Subsequent to the Commission's reason to believe findings in this matter, the Committee filed its 1984 April Quarterly Report which disclosed the receipt of \$10,000 from Andrews and Kurth on March 15, 1984. As reflected in the previous reason to believe finding in this matter, a partnership is limited to contributing \$5,000 per calendar year to a political committee. See 2 U.S.C. § 441a(f), § 441a(a)(1)(C), and 11 C.F.R. § 110.1(e). Hence, in connection with the above contribution, it is the recommendation of this office that the Commission find reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C).



(b) Operating and Solicitation Costs

3 5 0 4 0 5 3 1 0 1 5  
A review of reports filed by the Committee during the years in question herein (1981-1984) has also revealed that the Committee has not reported any operating (e.g., use of facilities, supplies) or solicitation costs whatsoever. The fact that the Committee resides at the same address as Andrews and Kurth suggests that the Committee's operating and solicitation costs were absorbed by Andrews and Kurth. This has been confirmed by the committee's treasurer. Although Andrews and Kurth may pay these costs, such costs constitute contributions to the Committee from Andrews and Kurth, which are subject to the annual limitation of \$5,000 per calendar year. See 2 U.S.C. §§ 441a(a)(1)(C) and 441a(f). Because the Committee does not constitute a separate segregated fund under 2 U.S.C. § 441b(b)(2), the Committee may not receive unlimited contributions from Andrews and Kurth for the expenses relating to the administration of the Committee. See Advisory Opinion 1982-63 and California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981). In that from 1981 through 1984 the Committee accepted direct monetary contributions from Andrews and Kurth in excess of the contribution limitation, the operating and solicitation costs at issue constitute additional excessive contributions to the Committee from Andrews and Kurth. Hence, it is the recommendation of this office that the Commission find reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C) in connection with these costs.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 26, 1984

Jerry V. Kyle, Treasurer  
Andrews, Kurth Lawyers for  
America Committee  
Texas Commerce Tower  
Houston, Texas 77002

RE: MUR 1669  
Andrews, Kurth Lawyers for  
America Committee; Jerry V.  
Kyle, as treasurer

Dear Mr. Kyle:

On June 22, 1984, the Federal Election Commission determined that there is reason to believe the Andrews, Kurth Lawyers for America Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Andrews, Kurth Lawyers for America Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Andrews, Kurth Lawyers for America Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

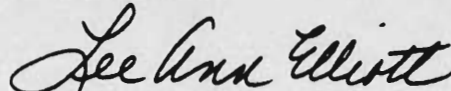
The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

85040531015

Letter to Jerry V. Kyle  
Page 2

If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

  
Lee Ann Elliott  
Chairman

Enclosure

General Counsel's Factual and Legal Analysis

85040531017

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1669

RESPONDENTS: Andrews, Kurth Lawyers for America Committee;  
Jerry V. Kyle, as treasurer

On April 10, 1984, the Commission determined that there is reason to believe the Andrews, Kurth Lawyers for America Committee ("Committee") and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totalling \$40,500 from Andrews and Kurth, a partnership, during the period of 1981 through 1983. The respondents were notified of the Commission's findings by letters dated April 12, 1984. A response was submitted on April 30, 1984.

(a) Direct Partnership Contributions

Subsequent to the Commission's reason to believe findings in this matter, the Committee filed its 1984 April Quarterly Report which disclosed the receipt of \$10,000 from Andrews and Kurth on March 15, 1984. As reflected in the previous reason to believe finding in this matter, a partnership is limited to contributing \$5,000 per calendar year to a political committee. See 2 U.S.C. § 441a(f), § 441a(a)(1)(C), and 11 C.F.R. § 110.1(e). Hence, in connection with the above contribution, it is the recommendation of this office that the Commission find reason to believe the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).

85040531018

(b) Operating and Solicitation Costs

85040531012  
A review of reports filed by the Committee during the years in question herein (1981-1984) has also revealed that the Committee has not reported any operating (e.g., use of facilities, supplies) or solicitation costs whatsoever. The fact that the Committee resides at the same address as Andrews and Kurth suggests that the Committee's operating and solicitation costs were absorbed by Andrews and Kurth. This has been confirmed by the Committee's treasurer. Although Andrews and Kurth may pay these costs, such costs constitute contributions to the Committee from Andrews and Kurth, which are subject to the annual limitation of \$5,000 per calendar year. See 2 U.S.C. §§ 441a(a)(1)(C) and 441a(f). Because the Committee does not constitute a separate segregated fund under 2 U.S.C. § 441b(b)(2), the Committee may not receive unlimited contributions from Andrews and Kurth for the expenses relating to the administration of the Committee. See Advisory Opinion 1982-63 and California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981). In that from 1981 through 1984 the Committee accepted direct monetary contributions from Andrews and Kurth in excess of the contribution limitation, the operating and solicitation costs at issue constitute additional excessive contributions to the Committee from Andrews and Kurth. Hence, it is the recommendation of this office that the Commission find reason to believe the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1669  
Andrews, Kurth Lawyers for )  
America Committee )  
Jerry V. Kyle, Treasurer )  
Andrews and Kurth )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 22, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1669:

1. Find reason to believe that the Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f) in connection with a direct monetary contribution from Andrews and Kurth during 1984, and in connection with the payment of its operating and solicitation costs by Andrews and Kurth.
2. Find reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C) in connection with a direct monetary contribution to the Committee during 1984, and in connection with the payment of the Committee's operating and solicitation costs.
3. Approve the letters attached to the General Counsel's Report signed June 19, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

6/25/84  
Date

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

85040531020



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cut*  
DATE: June 20, 1984  
SUBJECT: MUR 1669 - General Counsel's Report

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_

Open Session \_\_\_\_\_

Closed Session \_\_\_\_\_

CIRCULATIONS

48 Hour Tally Vote [X]  
Sensitive [X]  
Non-Sensitive [ ]

24 Hour No Objection [ ]  
Sensitive [ ]  
Non-Sensitive [ ]

Information [ ]  
Sensitive [ ]  
Non-Sensitive [ ]

Other [ ]

DISTRIBUTION

Compliance [X]

Audit Matters [ ]

Litigation [ ]

Closed MUR Letters [ ]

Status Sheets [ ]

Advisory Opinions [ ]

Other (see distribution below) [ ]

85040531021

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

In the Matter of )  
 )  
Andrews, Kurth Lawyers for ) MUR 1669  
America Committee; Jerry V. )  
Kyle, as treasurer; )  
Andrews and Kurth )

84 JUN 20 A 9: 17

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On April 10, 1984, the Commission determined that there is reason to believe the Andrews, Kurth Lawyers for America Committee ("Committee") and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totalling \$40,500 from Andrews and Kurth, a partnership, during the period of 1981 through 1983. The Commission also determined that Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C) by making the above excessive contributions to the Committee. The respondents were notified of the Commission's findings by letters dated April 12, 1984. A response was submitted on April 30, 1984.

**II. FACTUAL AND LEGAL ANALYSIS**

**(a) Direct Partnership Contributions**

Subsequent to the Commission's reason to believe findings in this matter, the Committee filed its 1984 April Quarterly Report which disclosed the receipt of \$10,000 from Andrews and Kurth on March 15, 1984. As discussed in the First General Counsel's Report (dated March 22, 1984) in this matter, a partnership is limited to contributing \$5,000 per calendar year to a political committee. See 2 U.S.C. § 441a(f), § 441a(a)(1)(C), and

11 C.F.R. § 110.1(e). Hence, in connection with the above contribution, it is the recommendation of this office that the Commission find reason to believe the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f), and that Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C).

(b) Operating and Solicitation Costs

A review of reports filed by the Committee during the years in question herein (1981-1984) has also revealed that the Committee has not reported any operating (e.g., use of facilities, supplies) or solicitation costs whatsoever. The fact that the Committee resides at the same address as Andrews and Kurth suggests that the Committee's operating and solicitation costs were absorbed by Andrews and Kurth. This has been confirmed by the committee's treasurer. Although Andrews and Kurth may pay these costs, such costs constitute contributions to the Committee from Andrews and Kurth, which are subject to the annual limitation of \$5,000 per calendar year. See 2 U.S.C. §§ 441a(a)(1)(C) and 441a(f). Because the Committee does not constitute a separate segregated fund under 2 U.S.C. § 441b(b)(2), the Committee may not receive unlimited contributions from Andrews and Kurth for the expenses relating to the administration of the Committee. See Advisory Opinion 1982-63 and California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981). In that from 1981 through 1984 the Committee accepted direct monetary contributions from Andrews and Kurth in excess of the contribution limitation, the operating and solicitation costs

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at issue constitute additional excessive contributions to the Committee from Andrews and Kurth. Hence, it is the recommendation of this office that the Commission find reason to believe the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f), and that Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C) in connection with these costs.

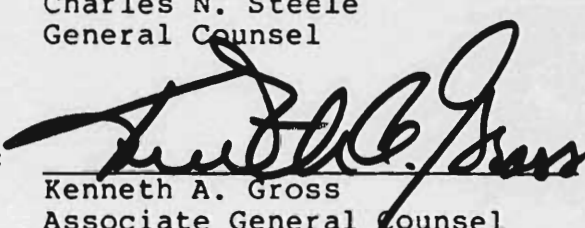
### III. Recommendations

1. Find reason to believe the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f) in connection with a direct monetary contribution from Andrews and Kurth during 1984, and in connection with the payment of its operating and solicitation costs by Andrews and Kurth.
2. Find reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C) in connection with a direct monetary contribution to the Committee during 1984, and in connection with the payment of the Committee's operating and solicitation costs.
3. Approve the attached letters.

Charles N. Steele  
General Counsel

June 19, 1984  
Date

By:

  
Kenneth A. Gross  
Associate General Counsel

Attachments  
Proposed letters (2)

85040531024





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Jerry V. Kyle, Treasurer  
Andrews, Kurth Lawyers for  
America Committee  
Texas Commerce Tower  
Houston, Texas 77002

RE: MUR 1669  
Andrews, Kurth Lawyers for  
America Committee; Jerry V.  
Kyle, as treasurer

Dear Mr. Kyle:

On , 1984, the Federal Election Commission determined that there is reason to believe the Andrews, Kurth Lawyers for America Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Andrews, Kurth Lawyers for America Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Andrews, Kurth Lawyers for America Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

Attachment 1(1)

Letter to Jerry V. Kyle  
Page 2

If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

Enclosure

General Counsel's Factual and Legal Analysis

85040531026

1(2)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1669

RESPONDENTS: Andrews, Kurth Lawyers for America Committee;  
Jerry V. Kyle, as treasurer

On April 10, 1984, the Commission determined that there is reason to believe the Andrews, Kurth Lawyers for America Committee ("Committee") and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totalling \$40,500 from Andrews and Kurth, a partnership, during the period of 1981 through 1983. The respondents were notified of the Commission's findings by letters dated April 12, 1984. A response was submitted on April 30, 1984.

(a) Direct Partnership Contributions

Subsequent to the Commission's reason to believe findings in this matter, the Committee filed its 1984 April Quarterly Report which disclosed the receipt of \$10,000 from Andrews and Kurth on March 15, 1984. As reflected in the previous reason to believe finding in this matter, a partnership is limited to contributing \$5,000 per calendar year to a political committee. See 2 U.S.C. § 441a(f), § 441a(a)(1)(C), and 11 C.F.R. § 110.1(e). Hence, in connection with the above contribution, it is the recommendation of this office that the Commission find reason to believe the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).

(b) Operating and Solicitation Costs

A review of reports filed by the Committee during the years in question herein (1981-1984) has also revealed that the Committee has not reported any operating (e.g., use of facilities, supplies) or solicitation costs whatsoever. The fact that the Committee resides at the same address as Andrews and Kurth suggests that the Committee's operating and solicitation costs were absorbed by Andrews and Kurth. This has been confirmed by the Committee's treasurer. Although Andrews and Kurth may pay these costs, such costs constitute contributions to the Committee from Andrews and Kurth, which are subject to the annual limitation of \$5,000 per calendar year. See 2 U.S.C. §§ 441a(a)(1)(C) and 441a(f). Because the Committee does not constitute a separate segregated fund under 2 U.S.C. § 441b(b)(2), the Committee may not receive unlimited contributions from Andrews and Kurth for the expenses relating to the administration of the Committee. See Advisory Opinion 1982-63 and California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981). In that from 1981 through 1984 the Committee accepted direct monetary contributions from Andrews and Kurth in excess of the contribution limitation, the operating and solicitation costs at issue constitute additional excessive contributions to the Committee from Andrews and Kurth. Hence, it is the recommendation of this office that the Commission find reason to believe the Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Charles E. Curbo  
Andrews and Kurth  
Texas Commerce Tower  
Houston, Texas 77002

RE: MUR 1669  
Andrews and Kurth

Dear Mr. Curbo:

On , 1984, the Federal Election Commission determined that there is reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Andrews and Kurth. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against Andrews and Kurth, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

1(5)



Letter to Charles E. Curbo  
Page 2

If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

Enclosure  
General Counsel's Factual and Legal Analysis

85040531030

1(6)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1669

RESPONDENTS: Andrews and Kurth

On April 10, 1984, the Commission determined that there is reason to believe a partnership, Andrews and Kurth, violated 2 U.S.C. § 441a(a)(1)(C) by making excessive contributions totalling \$40,500 to the Andrews, Kurth, Lawyers for America Committee ("Committee") during the period of 1981 through 1983. The respondents were notified of the Commission's findings by letters dated April 12, 1984. A response was submitted on April 30, 1984.

(a) Direct Partnership Contributions

Subsequent to the Commission's reason to believe findings in this matter, the Committee filed its 1984 April Quarterly Report which disclosed the receipt of \$10,000 from Andrews and Kurth on March 15, 1984. As reflected in the previous reason to believe finding in this matter, a partnership is limited to contributing \$5,000 per calendar year to a political committee. See 2 U.S.C. § 441a(f), § 441a(a)(1)(C), and 11 C.F.R. § 110.1(e). Hence, in connection with the above contribution, it is the recommendation of this office that the Commission find reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C).

(b) Operating and Solicitation Costs

8 5 0 4 0 5 3 1 0 3 2  
A review of reports filed by the Committee during the years in question herein (1981-1984) has also revealed that the Committee has not reported any operating (e.g., use of facilities, supplies) or solicitation costs whatsoever. The fact that the Committee resides at the same address as Andrews and Kurth suggests that the Committee's operating and solicitation costs were absorbed by Andrews and Kurth. This has been confirmed by the committee's treasurer. Although Andrews and Kurth may pay these costs, such costs constitute contributions to the Committee from Andrews and Kurth, which are subject to the annual limitation of \$5,000 per calendar year. See 2 U.S.C. §§ 441a(a)(1)(C) and 441a(f). Because the Committee does not constitute a separate segregated fund under 2 U.S.C. § 441b(b)(2), the Committee may not receive unlimited contributions from Andrews and Kurth for the expenses relating to the administration of the Committee. See Advisory Opinion 1982-63 and California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981). In that from 1981 through 1984 the Committee accepted direct monetary contributions from Andrews and Kurth in excess of the contribution limitation, the operating and solicitation costs at issue constitute additional excessive contributions to the Committee from Andrews and Kurth. Hence, it is the recommendation of this office that the Commission find reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C) in connection with these costs.

1(8)

WASHINGTON, D. C. OFFICE  
ANDREWS & KURTH  
1747 PENNSYLVANIA AVE., N.W.  
WASHINGTON, D. C. 20006  
(202) 861-7400

ANDREWS & KURTH  
ATTORNEYS  
TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200  
TELECOPIER: (713) 220-4295  
TELEX: 79-1208

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84 APR 30 P 1:30  
DALLAS OFFICE  
ANDREWS, KURTH & RITCHIE  
1100 REPUBLICBANK BUILDING  
DALLAS, TEXAS 75201  
(214) 742-6285

April 27, 1984

*Mur 1669*  
*White*

FEDERAL ELECTION COMMISSION  
Public Records Division  
1325 K Street, N.W.  
Washington, D.C. 20463

Attn: Ms. Maura White

Re: MUR 1669 Andrews, Kurth Lawyers for America Committee  
Jerry V. Kyle, as treasurer

Dear Ms. White:

In response to your letter dated April 12, 1984 concerning contributions made to the Andrews, Kurth Lawyers for America Committee (the "Committee") by the partners of the law firm Andrews & Kurth, on behalf of the Committee and me, as Treasurer and also on behalf of the law firm, Andrews & Kurth, I submit the following information, facts and legal analysis.

As the General Counsel's Factual and Legal Analysis (which you furnished us with your April 12 letter) indicates, the term "person" is defined at 2 U.S.C. § 431(11) to include a partnership. Further, 2 U.S.C. § 441(a)(1)(C) provides that no "person" shall make contributions to a political committee which exceed \$5,000 per year.

The Commission's regulations (11 C.F.R. § 110.1(e)), however, provide that a contribution by a partnership shall be attributed to each partner in accordance with an agreement of the partners provided that the partnership profits are reduced in proportion to the contribution attributed to each of them.

If 11 C.F.R. § 110.1(e) is complied with and a partnership contribution is attributed to each of the partners as therein set forth, the contribution would not also be attributed to the partnership as an entity. The purpose of the attribution rules in the regulations is to permit a partnership to attribute a partnership contribution to each of its partners only if the regulations are satisfied. There is no provision in the statute or the regulations which indicate a contribution will be counted twice or attributed to more than one "person". By letter dated January 23, 1984, the Committee furnished the Commission with the names of the contributing partners for the years 1978 - 1984.

A second answer to the allegations of the Commission in the captioned matter is that while a partnership check was used for making the contribution to the Committee, the check represented a contribution by the firm as agent for each of the contributing partners.

Please let me know if you need additional information.

Sincerely,



Jerry V. Kyle

086:jlh

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FROM:

Walter V. Kyle  
Andrews & Kurth  
4200 Texas Commerce Tower  
Houston, Texas 77002

98100

Customer Number (if any)

TO:

FEDERAL ELECTION COMMISSION  
Public Records Division  
1325 K Street, N.W.  
Washington, D.C. 20463

• U.S.G.P.O. 1963 490 (14 Label) 11-B, Apr. 1963

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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COMMISSION SECRETARY  
34 APR 12 A 9: 56

April 12, 1984

**SENSITIVE**

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel  
By: Kenneth A. Gross  
Associate General Counsel  
SUBJECT: RAD Referral 84L-2

On April 10, 1984 the Commission approved the recommendation that the subject RAD Referral be made a MUR. Therefore, all documents which had previously been identified as RAD Referral 84L-2 should now become MUR # 1669.

Attachment  
Copy of Certification

85040531036

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Andrews, Kurth Lawyers for America Committee )

Jerry V. Kyle, as Treasurer )

Andrews and Kurth )

RAD REF #84L-2

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on April 10, 1984, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions with respect to RAD Referral #84L-2:

1. Open a Matter Under Review.
2. Find reason to believe Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C).
4. Approve the letters attached to the General Counsel's report dated March 22, 1984.

Commissioners Aikens, Harris, McDonald, and McGarry voted affirmatively for the decision; Commissioners Elliott and Reiche dissented.

Attest:

4-11-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

85040531037



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 12, 1984

Andrews and Kurth  
Texas Commerce Tower  
Houston, Texas 77002

RE: MUR 1669  
Andrews and Kurth

Dear Sir or Madam:

On April 10, 1984, the Federal Election Commission determined that there is reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Andrews and Kurth. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

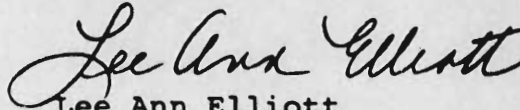
In the absence of any additional information which demonstrates that no further action should be taken against Andrews and Kurth, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202)523-4057.

Sincerely,



Lee Ann Elliott  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

85040531039



FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Andrews and Kurth

MUR NO. 1669

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

SUMMARY OF ALLEGATIONS

Andrews and Kurth, a partnership, made excessive contributions totalling \$40,500 to Andrews, Kurth Lawyers for America Committee ("Committee"), in violation of 2 U.S.C. § 441a(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

Reports filed by the Committee during 1981, 1982, and 1983, revealed the receipt of \$27,500, \$8,000, and \$20,000, respectively, from Andrews and Kurth, a partnership.

The term "person" is defined at 2 U.S.C. § 431(11) to include a partnership. Pursuant to 2 U.S.C. § 441a(a)(1)(C), no person shall make contributions to a political committee in any calendar year which, in the aggregate, exceed \$5,000 per calendar year.

The Commission's regulations at 11 C.F.R. § 110.1(e) state that a contribution by a partnership shall: (1) be attributed to each partner in direct proportion to his or her share of the partnership profits, according to instructions which shall be provided by the partnership to the committee or candidate; or (2) be attributed by agreement of the partners, as long as

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(i) only the profits of the partners to whom the contribution is attributed are reduced (or losses increased), and (ii) these partnership profits are reduced (or losses increased) in proportion to the contribution attributed to each of them; and, (3) not exceed the limits of § 110.1(a), (b), and (c).

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The evidence in hand indicates that Andrews and Kurth have violated 2 U.S.C. § 441a(a)(1)(C) by contributing \$40,500 in excess of the contribution limitation to the Committee. The contributions at issue were made with partnership checks drawn on the partnership account. Although the contributions at issue count against the individual contribution limitation of each of the firm's consenting partners, the contributions also count against the partnership's limitation as a separate entity and a "person" under the Act. The Act and Commission regulations specifically limit contributions to a political committee that are drawn on partnership funds to \$5,000 per calendar year. See 2 U.S.C. § 441a(a)(1)(C) and 11 C.F.R. § 110.1(e)(3). It is, therefore, the recommendation of the General Counsel that there is reason to believe Andrews and Kurth have violated 2 U.S.C. § 441a(a)(1)(C).



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 12, 1984

Jerry V. Kyle, Treasurer  
Andrews, Kurth Lawyers  
for America Committee  
4200 Texas Commerce Tower  
Houston, Texas 77002

RE: MUR 1669  
Andrews, Kurth Lawyers for America  
Committee; Jerry V. Kyle, as  
treasurer

Dear Mr. Kyle:

On April 10, 1984, the Federal Election Commission determined that there is reason to believe the Andrews, Kurth Lawyers for America Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202)523-4057.

Sincerely,

  
Lee Ann Elliott  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

85040531043

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Andrews, Kurth Lawyers MUR 1669  
for America Committee;  
Jerry V. Kyle, as treasurer

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

SUMMARY OF ALLEGATIONS

The Andrews, Kurth Lawyers for America Committee ("Committee") accepted excessive contributions totalling \$40,500 from a partnership, Andrews and Kurth, during the period of 1981 through 1983, in violation of 2 U.S.C. § 441a(f).

FACTUAL BASIS AND LEGAL ANALYSIS

Reports filed by the Committee during 1981 disclosed the receipt of \$7,500, \$10,000, and \$10,000 (an aggregate of \$27,500) from Andrews and Kurth on April 10, 1981, October 23, 1981, and November 3, 1981, respectively. The Committee's 1982 reports disclosed the receipt of \$6,000 and \$2,000 from Andrews and Kurth on June 3, 1982, and September 17, 1982, respectively. Andrews and Kurth is the connected organization of the Committee and a law firm comprised of numerous partners. On October 5, 1983, a Request for Additional Information ("RFAI") was mailed to the Committee concerning its 1981 and 1982 reports. The RFAI advised the Committee to refund the amount it received from Andrews and Kurth in excess of \$5,000 per calendar year. On October 27,

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1983, a second notice was mailed to the Committee, the same day that the Committee submitted its response to the RFAI of October 5, 1983.

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The response submitted by the Committee states that it is a "PAC consisting of all of the partners in the law firm" and that "[e]ach of the partners has agreed and does contribute equally to the PAC." According to the response submitted, "funds are received by the PAC from time to time by one single check drawn on partnership funds, and then each individual partner's distribution account is charged for his or her equal contribution, which has been agreed to by each partner." The response continues on to state that between 1981 and 1983 the number of partners has "varied from not less than 47 and at present there are 53 partners." The response concludes that "the amount involved for each individual is relatively modest and well below any ceiling in any respective calendar year or for any particular election," and that "in the future we will be careful to identify on the reports that any deposits are from the partners in the law firm."

In response to a telephone conversation with a staff member of RAD, the Committee submitted further information on January 26, 1984. The Committee's letter stated that the "law firm partnership as a partnership and as an entity has and does not contribute to this PAC; rather all of its partners . . . have contributed and do contribute to the PAC." Accompanying the Committee's letter was a list of all of the partners in Andrews

and Kurth which purportedly represents "all of the members of and contributors to the PAC since its inception in the calendar year 1978 through the calendar year 1983."

The General Counsel also notes that the Committee's 1983 reports disclose the receipt of \$5,000, \$5,000, and \$10,000 from Andrews and Kurth on April 21, 1983, October 13, 1983, and November 30, 1983, respectively.

The term "person" is defined at 2 U.S.C. § 431(11) to include a partnership.

Pursuant to 2 U.S.C. § 441a(a)(1)(C) no person shall make contributions to a political committee in any calendar year which, in the aggregate, exceed \$5,000 per calendar year. As set forth at 2 U.S.C. § 441a(f) no political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 441a.

The Commission's regulations at 11 C.F.R. § 110.1(e) state that a contribution by a partnership shall: (1) be attributed to each partner in direct proportion to his or her share of the partnership profits, according to instructions which shall be provided by the partnership to the committee or candidate; or (2) be attributed by agreement of the partners, as long as (i) only the profits of the partners to whom the contribution is attributed are reduced (or losses increased), and (ii) these partnership profits are reduced (or losses increased) in proportion to the contribution attributed to each of them; and, (3) not exceed the limits of § 110.1(a), (b), and (c).

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The evidence in hand indicates that the Committee and its treasurer have violated 2 U.S.C. § 441a(f) during 1981, 1982, and 1983 by accepting excessive contributions totalling \$40,500 from a partnership, Andrews and Kurth. In the General Counsel's view, the Committee's contention that it did not accept excessive contributions from Andrews and Kurth because the funds donated represent only the individual contributions of the firm's consenting partners and not "contributions" from the partnership itself, is without merit. The contributions at issue were made with partnership checks drawn on the partnership account. Although the contributions at issue count against the individual contribution limitation of each of the firm's consenting partners, the contributions also count against the partnership's limitation as a separate entity and a "person" under the Act. The Act and Commission regulations specifically limit contributions to a political committee that are drawn on partnership funds to \$5,000 per calendar year. See 2 U.S.C. § 441a(a)(1)(C) and 11 C.F.R. § 110.1(e)(3). In view of the foregoing, it is the recommendation of the General Counsel that the Commission find reason to believe Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).

85740531047

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Andrews, Kurth Lawyers for America Committee ) RAD REF #84L-2  
Jerry V. Kyle, as Treasurer )  
Andrews and Kurth )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on April 10, 1984, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions with respect to RAD Referral #84L-2:

1. Open a Matter Under Review.
2. Find reason to believe Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a) (1) (C).
4. Approve the letters attached to the General Counsel's report dated March 22, 1984.

Commissioners Aikens, Harris, McDonald, and McGarry voted affirmatively for the decision; Commissioners Elliott and Reiche dissented.

Attest:

4-11-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

35040531048



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*  
DATE: MARCH 27, 1984  
SUBJECT: OBJECTIONS - RAD REFERRAL 84L-2  
First General Counsel's Report  
signed March 22, 1984

The above-named document was circulated to the  
Commission on Friday, March 23, 1984 at 2:00.

Objections have been received from the Commissioners  
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Harris	_____ X _____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session  
agenda for Tuesday, April 3, 1984.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. ENMONS/ JODY C. RANSOM *JCR*  
DATE: MARCH 26, 1984  
SUBJECT: RAD REFERRAL 84L-2 First General Counsel's  
Report signed March 22, 1984

The above-named document was circulated to the  
Commission on Friday, March 23, 1984 at 2:00.

Objections have been received from the Commissioners  
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session  
agenda for Tuesday, April 3, 1984.

85040531050



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cit*  
DATE: March 22, 1984  
SUBJECT: RAD Referral 84L-2: First General Counsel's Report

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_  
Open Session \_\_\_\_\_  
Closed Session \_\_\_\_\_

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[X]	Compliance	[X]
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Non-Sensitive	[ ]	Litigation	[ ]
24 Hour No Objection	[ ]	Closed MUR Letters	[ ]
Sensitive	[ ]	Status Sheets	[ ]
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Information	[ ]	Other (see distribution below)	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]		
Other	[ ]		

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

84 MAR 22 P 3: 40

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION 3/22/84 - 3:40

RAD REF #84L-2  
STAFF MEMBER:  
Maura White

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

RESPONDENT'S NAME: Andrews, Kurth Lawyers for America Committee;  
Jerry V. Kyle, as Treasurer;  
Andrews and Kurth

RELEVANT STATUTE: 2 U.S.C. §§ 441a(f) and 441a(a)(1)(A)

INTERNAL REPORTS CHECKED: Public records

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

On February 1, 1984, the Reports Analysis Division ("RAD") referred the Andrews, Kurth Lawyers for America Committee ("Committee") to the Office of General Counsel. (Attachment 1.)

FACTUAL AND LEGAL ANALYSIS

(a) The facts

Reports filed by the Committee during 1981 disclosed the receipt of \$7,500, \$10,000, and \$10,000 (an aggregate of \$27,500) from Andrews and Kurth on April 10, 1981, October 23, 1981, and November 3, 1981, respectively. Andrews and Kurth is the connected organization of the Committee and a law firm comprised of numerous partners. On October 5, 1983, a Request for Additional Information ("RFAI") was mailed to the Committee. The RFAI advised the Committee to refund the amount it received

from Andrews and Kurth in excess of \$5,000 per calendar year.<sup>1/</sup>  
On October 27, 1983, a second notice was mailed to the Committee,  
the same day that the Committee submitted its response to the  
RFAI of October 5, 1983.

The response submitted by the Committee states that it is a  
"PAC consisting of all of the partners in the law firm" and that  
"[e]ach of the partners has agreed and does contribute equally to  
the PAC." According to the response submitted, "funds are  
received by the PAC from time to time by one single check drawn  
on partnership funds, and then each individual partner's  
distribution account is charged for his or her equal  
contribution, which has been agreed to by each partner." The  
response continues on to state that between 1981 and 1983 the  
number of partners has "varied from not less than 47 and at  
present there are 53 partners." The response concludes that "the  
amount involved for each individual is relatively modest and well  
below any ceiling in any respective calendar year or for any

---

<sup>1/</sup> The RFAI specifically referenced the Committee's 1981  
Mid-Year and Year-End Reports, as well as the 1982 July and  
October Quarterly Reports. During 1982 and 1983, the  
Committee accepted a total of \$8,000 and \$20,000,  
respectively, from Andrews and Kurth. Although the 1982  
contributions were not referred to this office because,  
according to the memorandum from RAD, "these contributions  
do not meet the threshold for referral," the Office of General  
Counsel has incorporated the 1982-83 information into this  
matter.

The RFAI also informed the Committee that contributions  
from Andrews and Kurth are attributable "to each person  
based upon their percentage of ownership of the firm," but  
that any other formula may be used. The RFAI also stated  
that each "person who has contributed in excess of \$200  
since January 1 should be identified by name, address, name  
of employer, amount of contribution, and aggregate total."

particular election," and that "in the future we will be careful to identify on the reports that any deposits are from the partners in the law firm."

In response to a telephone conversation with a staff member of RAD, the Committee submitted further information on January 26, 1984. The Committee's letter stated that the "law firm partnership as a partnership and as an entity has and does not contribute to this PAC; rather all of its partners . . . have contributed and do contribute to the PAC." Accompanying the Committee's letter was a list of all of the partners in Andrews and Kurth which purportedly represents "all of the members of and contributors to the PAC since its inception in the calendar year 1978 through the calendar year 1983."<sup>2/</sup>

(b) The law applicable

The term "person" is defined at 2 U.S.C. § 431(11) to include a partnership.

Pursuant to 2 U.S.C. § 441a(a)(1)(C) no person shall make contributions to a political committee in any calendar year which, in the aggregate, exceed \$5,000 per calendar year. As set forth at 2 U.S.C. § 441a(f) no political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 441a.

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<sup>2/</sup> The information submitted by the Committee indicates that between 1978 and 1983 the number of partners contributing to the Committee varied from 36 to 53. Each partner was identified by name, business address, and years of their contributions.



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The Commission's regulations at 11 C.F.R. § 110.1(e) state that a contribution by a partnership shall: (1) be attributed to each partner in direct proportion to his or her share of the partnership profits, according to instructions which shall be provided by the partnership to the committee or candidate; or (2) be attributed by agreement of the partners, as long as (i) only the profits of the partners to whom the contribution is attributed are reduced (or losses increased), and (ii) these partnership profits are reduced (or losses increased) in proportion to the contribution attributed to each of them; and, (3) not exceed the limits of § 110.1(a), (b), and (c).

(c) Application of the law to the facts

The evidence in hand indicates that the Committee and its treasurer have violated 2 U.S.C. § 441a(f) during 1981, 1982, and 1983 (see footnote 1) by accepting excessive contributions totalling \$40,500 from a partnership, Andrews and Kurth, and that Andrews and Kurth have violated 2 U.S.C. § 441a(a)(1)(C) by making excessive contributions to the Committee. In the General Counsel's view, the Committee's contention that it did not accept excessive contributions from Andrews and Kurth because the funds donated represent the individual contributions of the firm's consenting partners and not "contributions" from the partnership itself, is without merit. The contributions at issue were made with partnership checks drawn on the partnership account. Although the contributions count against the individual contribution limitation of each of the firm's consenting

partners, the contributions also count against the partnership's limitation as a separate entity and a "person" under the Act. The Act and Commission regulations specifically limit contributions to a political committee that are drawn on partnership funds to \$5,000 per calendar year. See 2 U.S.C. § 441a(a)(1)(C) and 11 C.F.R. § 110.1(e)(3). In view of the foregoing, it is the recommendation of the General Counsel that the Commission open a Matter Under Review and find reason to believe Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f), and that Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C).

RECOMMENDATIONS

1. Open a Matter Under Review.
2. Find reason to believe Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C).
4. Approve the attached letters.

Charles N. Steele  
General Counsel

3/22/84  
Date

By: Kenneth A. Gross (4292)  
Kenneth A. Gross  
Associate General Counsel

Attachments

- 1 - RAD Referral
- 2 - Proposed Letters (2)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

1 February 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *JS*  
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JDG*  
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REFERRAL OF ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE

Please find the attached referral of the Andrews, Kurth Lawyers For America Committee ("AKLAC"). In 1981 AKLAC received \$22,500 in excessive contributions from a partnership, which has not been refunded. According to the Review and Referral Procedures (Chart 3), further examination is required by your office.

It should also be noted that in 1982 AKLAC received a total of \$3,000 in excessive contributions from the same partnership. However, under Chart 3 these contributions do not meet the threshold for referral. In addition, AKLAC's 1983 reports reveal \$15,000 in apparent excessive contributions from the partnership.

If there are any questions, please contact Theresa Harley at 523-4048.

Attachment

*Attachment 1(1)*

85040531057

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 1 February 1984ANALYST: Theresa Harley

I. COMMITTEE: Andrews, Kurth Lawyers For  
America Committee  
(C00089540)  
Jerry V. Kyle, Treasurer  
4200 Texas Commerce Tower  
Houston, TX 77002

II. RELEVANT STATUTE: 2 U.S.C. 441a(f)

## III. BACKGROUND:

Receipt of Excessive Contributions - 2 U.S.C. 441a(f)

The 1981 Mid-Year Report filed by the Andrews, Kurth Lawyers For America Committee ("AKLAC") disclosed a \$2,500 excessive contribution from Andrews, Kurth, Campbell & Jones on April 10, 1981 (Attachment 2). The 1981 Year End Report disclosed a total of \$20,000 in excessive contributions from Andrews & Kurth, \$10,000 on October 23, 1981 and \$10,000 on November 3, 1981 (Attachment 3).

A Request For Additional Information was sent on October 5, 1983 advising AKLAC that the Act precludes a committee from receiving contributions from another political committee or an individual in excess of \$5,000 per calendar year. A refund was requested for the amount in excess of \$5,000 (Attachment 4). A Second Notice was sent on October 27, 1983, the same day the response was received (Attachment 5).

The October 27th response from AKLAC stated that funds are received by the PAC from time to time by one single check drawn on partnership funds, and then each individual partner's distribution account is charged for his or her equal contribution, which has been agreed to by each partner. The response further stated that the number of partners varies because of death, withdrawal, or new partners. However, it has never varied from less than 47 and at present there are 53 partners (Attachment 6). Neither the letter nor the reports listed the individual partners or gave a breakdown in dollar amounts contributed.

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ANDREWS KURTH LAWYERS FOR AMERICA COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

On December 21, 1983, the analyst called Mr. Eastland, attorney for the PAC, but he was out of town. The representative for AKLAC, Jan Cochran, said she would contact him and have him call in a few days. He never called (Attachment 7).

The analyst called again on January 12 and 13, 1984. Although Mr. Eastland had returned from his trip, he was not available for comment and failed to return the calls (Attachments 8 and 9).

On January 17, 1984, Mr. Eastland called. The analyst attempted to explain the reporting problems and to discuss AKLAC's response of October 27, 1983. It was Mr. Eastland's opinion that the contribution was not excessive because none of the partners exceeded their contribution limitation. The analyst reiterated the requirements of 441a and requested itemization of any partner which exceeded \$200 in the aggregate. Mr. Eastland became somewhat rude, but said he would send a list of the partners. Before the analyst could respond, Mr. Eastland abruptly hung up the phone (Attachment 10).

On January 26, 1984, a response was received from Mr. Eastland, confirming statements made in a recent phone conversation. According to the response, "the law firm partnership as a partnership and as an entity has and does not contribute to this PAC; rather all of its partners, as such partners change from time to time, have contributed and do contribute to the PAC." Included with the response is a list of all partners, who have contributed "to the PAC since its inception in the calendar year 1978 through the calendar year 1983" (Attachment 11).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

There are no outstanding Requests for Additional Information or matters requiring referral at this time for this committee.



NON-PARTY RELATED

Attachment 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
ANDREWS KURTH LAWYERS FOR AMERICA COMMITTEE				NON-PARTY QUALIFIED		ID 1000089540
CONNECTED ORGANIZATION:	ANDREWS, KURTH, CAMPBELL, & JONES					
1981	MID-YEAR REPORT	7,500	2,000	1JAN81 -30JUN81	5	81FEC/202/4296
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN81 -30JUN81	1	83FEC/286/1885
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JAN81 -30JUN81	1	83FEC/284/3262
	REQUEST FOR ADDITIONAL INFORMATION END	-	-	1JAN81 -30JUN81	1	83FEC/286/2157
	YEAR-END	20,000	20,250	1JUL81 -31DEC81	5	82FEC/221/0241
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	1	83FEC/286/1884
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL81 -31DEC81	1	83FEC/284/3283
	REQUEST FOR ADDITIONAL INFORMATION END	-	-	1JUL81 -31DEC81	1	83FEC/286/2150
1982	MISCELLANEOUS REPORT	-	-	2FEB82 TO FEC	2	82FEC/222/5277
	APRIL QUARTERLY	0	2,650	1JAN82 -31MAR82	7	82FEC/228/0095
	JULY QUARTERLY	6,000	6,150	1APR82 -30JUN82	5	82FEC/234/5230
	JULY QUARTERLY - AMENDMENT	-	-	1APR82 -30JUN82	1	83FEC/286/1882
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1APR82 -30JUN82	1	83FEC/284/3294
	REQUEST FOR ADDITIONAL INFORMATION END	-	-	1APR82 -30JUN82	1	83FEC/286/2159
	OCTOBER QUARTERLY	2,000	4,500	1JUL82 -30SEP82	5	82FEC/252/4497
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	4	83FEC/286/1683
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL82 -30SEP82	6	83FEC/284/1152
	REQUEST FOR ADDITIONAL INFORMATION END	-	-	1JUL82 -30SEP82	7	83FEC/286/2027
	PRE-GENERAL	0	0	1OCT82 -18OCT82	2	82FEC/250/4949
	POST-GENERAL	0	200	14OCT82 -22NOV82	4	82FEC/258/4382
	YEAR-END	0	250	23NOV82 -31DEC82	4	83FEC/265/0442
	TOTAL	35,500	0 36,000	0	65	TOTAL PAGES.

All reports have received condensed Review A

Cash on hand as of 12/31/83 \$150

Debts Outstanding \$0

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8 5 0 4 0 5 7 1 0 6 1  
 FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 31JAN84  
 PAGE 1

NON-PARTY RELATED

Attachment 1 (continued)

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
ANDREWS KURTH LAWYERS FOR AMERICA COMMITTEE				NON-PARTY QUALIFIED		ID #C00089540
CONNECTED ORGANIZATION: ANDREWS, KURTH, CAMPBELL, & JONES						
1983	MID-YEAR REPORT	10,000	7,500	1JAN83 -31JUL83	5	83FEC/280/4065
	OCTOBER QUARTERLY	5,000	3,100	1AUG83 -15OCT83	5	83FEC/286/3387
	POST-SPECIAL	5,000	5,200	16OCT83 - 3DEC83	5	83FEC/289/1905
	YEAR-END	0	0	4DEC83 -31DEC83	3	84FEC/292/1069
	TOTAL	20,000	0	15,800	0	18 TOTAL PAGES

No reports reviewed

Cash on hand as of 12/31/83 \$4339.  
 Debts Outstanding \$0

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 (5)

**SCHEDULE A**

**ITEMIZED RECEIPTS**

LINE 4 JUNE 1981  
This schedule should be filed for each category of the following categories:  
Schedule Page 1

1981 Mid-Year Report Attachment 2

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

Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
ANDREWS, KURTH, CAMPBELL & JONES 2500 Exxon Building Houston, Texas 77002		4/10/81	\$7,500.00
Receipt For: <input checked="" type="checkbox"/> Other (specify) PAC Funds	Occupation	Aggregate Year-to-Date - \$7,500.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date - \$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date - \$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date - \$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date - \$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date - \$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date - \$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			\$7,500.00

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1981 Year-end Report Attachment 3

Any information copied from such Reports or 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.

Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE

A. Full Name, Mailing Address and ZIP Code

ANDREWS & KURTH  
4200 Texas Commerce Tower  
Houston, Texas 77002

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

10/23/81 \$10,000.00

Occupation

Receipt For: ☐ Primary ☐ General

☒ Other (specify) PAC Funds

Aggregate Year-to-Date-\$ 17,500.00

B. Full Name, Mailing Address and ZIP Code

ANDREWS & KURTH  
4200 Texas Commerce Tower  
Houston, Texas 77002

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

11/3/81 10,000.00

Occupation

Receipt For: ☐ Primary ☐ General

☒ Other (specify) PAC Funds

Aggregate Year-to-Date-\$ 27,500.00

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)

Amount of Each  
Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

\$20,000.00

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

5 October 1983 RQ-2

Jerry V. Kyle, Treasurer  
Andrews, Kurth Lawyers of America Committee  
4200 Texas Commerce Tower  
Houston, TX 77002

Identification Number: C00089540

Reference: Mid-Year (1/1/81-6/30/81), Year End (7/1/81-12/31/81), July Quarterly (4/1/82-6/30/82) and October Quarterly (7/1/82-9/30/82) Reports

Dear Mr. Kyle:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or an individual in excess of \$5,000 per calendar year. (2 U.S.C. 441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$5,000. Please inform the Commission, in writing, of the refund and provide a photocopy of your check sent to the donor. In addition, any refund should be disclosed on Line 26a of Schedule B of your next report.

If you find the contribution(s) in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

-You have received a contribution from Andrews, Kurth, Campbell & Jones, which appears to be an unincorporated proprietorship or partnership. Generally, these types

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of contributions are attributed to each person based on their percentage of ownership of the firm, however, any other accepted formula may be used. Each person who has contributed in excess of \$200 since January 1 should be identified by name, address, name of employer, amount of contribution, and aggregate total on Schedule A. (11 CFR 110.1(e))

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm this effort, in writing. (11 CFR 104.3(a)(4)(i) and 11 CFR 104.7)

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

*Theresa C. Harley*

Theresa Harley  
Reports Analyst  
Reports Analysis Division

85040531065



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Attachment 3

RQ-3

October 27, 1983

Jerry V. Kyle, Treasurer  
Andrews, Kurth Lawyers of  
America Committee  
4200 Texas Commerce Tower  
Houston, TX 77002

Identification Number: C00089540

Reference: Mid-Year (1/1/81-6/30/81), Year End  
(7/1/81-12/31/81), July Quarterly (4/1/82-6/30/82)  
and October Quarterly (7/1/82-9/30/82) Reports

Dear Mr. Kyle:

This letter is to inform you that as of October 26, 1983, the Commission has not received your response to our request for additional information, dated October 5, 1983. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Theresa Harley on our toll-free number (800) 424-9530 or our local number (202) 357-0026.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

ANDREWS & KURTH

ATTORNEYS

TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200  
TELECOPIER: (713) 220-4208  
TELEX: 79-1208

83 OCT 27 10:28

WASHINGTON, D.C. OFFICE  
ANDREWS & KURTH  
47 PENNSYLVANIA AVE., N.W.  
WASHINGTON, D.C. 20006  
(202) 661-7400

DALLAS OFFICE  
ANDREWS, KURTH & RITCHIE  
1100 REPUBLICAN BUILDING  
DALLAS, TEXAS 75201  
(214) 742-6262

October 25, 1983

Ms. Theresa Harley  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Your Identification Number: C00089540

Dear Madam:

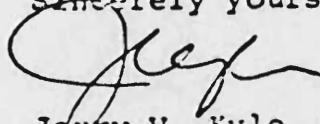
Reference is made to your letter dated October 5, 1983, a copy of which is enclosed for your ready reference and convenience.

Andrews, Kurth Lawyers for America Committee is a multi-candidate PAC consisting of all of the partners in this law firm which has offices in Washington, D.C. and Dallas, as well as the original office in Houston. Each of the partners has agreed and does contribute equally to the PAC.

For convenience sake, funds are received by the PAC from time to time by one single check drawn on partnership funds, and then each individual partner's distribution account is charged for his or her equal contribution, which has been agreed to by each partner. Of course the number of partners has varied slightly from time to time and changes through death, withdrawal, becoming a new partner, etc., but in the years mentioned in your letter and in the present year it has never varied from less than 47 and at present there are 53 partners. Thus, the amount involved for each individual is relatively modest and well below any ceiling in any respective calendar year or for any particular election.

We trust this answers your questions completely, and in the future we will be careful to identify on the reports that any deposits are from the partners in this law firm.

Sincerely yours,



Jerry V. Kyle, Treasurer  
Andrews, Kurth Lawyers for  
America Committee

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Enclosure

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MEMORANDUM TO THE FILES: TELECON

COMMITTEE NAME: Andrews, Kurth Lawyers of America Committee

COMMITTEE CONTACT: Seaborn Eastland

TELEPHONE #(713) 220-4200

DATE: 12-21-83

ANALYST: Theresa Harley

SUBJECT: Excessive Partnership Contribution

Today I called Mr. Eastland in reference to the excessive partnership contribution notice. He was out of town, so I was referred to his secretary, Jan Cochran. I explained what I was calling about and asked if she could answer some questions. She said she'd rather I talk to Mr. Eastland. She explained that Mr. Eastland would be out of town until January but, she would get in touch with him and have him call me in a few days.

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MEMORANDUM TO THE FILES: TELECON

COMMITTEE NAME: Andrews, Kurth Lawyers for America Committee

COMMITTEE CONTACT: Jan Cochran

TELEPHONE # (713) 220-4200

DATE: January 12, 1984

ANALYST: Theresa Harley

SUBJECT: Excessive Partnership Notice

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I placed another call to the office of Mr. Eastland today. I was told by Ms. Cochran that he was in a meeting and she would have him return my call. He did not.

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• MEMORANDUM TO FILE:

*Date:* January 13, 1984

FROM: Theresa Harley

TO: Jan Cochran

NAME OF COMMITTEE: Andrews, Kurth Lawyers for America Committee

TELEPHONE #: (713) 220-4200

---

I called Mr. Eastland again today. I was told by Ms. Cochran that he was out of the office but she would have him call me when he returns. Mr. Eastland never called.

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MEMORANDUM TO THE FILES: TELECON

COMMITTEE NAME: Andrews, Kurth Lawyers for America Committee

COMMITTEE CONTACT: Seaborn Eastland

TELEPHONE # (713) 220-4200

DATE: 1/17/84

ANALYST: Theresa Harley

SUBJECT: Excessive Partnership Contribution

Mr. Eastland called today explaining that his secretary said I had been trying to reach him. I told him I had been calling for several weeks. I said I wanted to explain the notice we had sent about the excessive partnership contributions, to discuss his response and go over some other details.

I began by explaining that his response of 10/27/83 indicated there were 53 individual contributors but, because the report showed the contribution from the partnership, it appeared as though the committee had exceeded the partnership limitation of \$5,000. He was very abrupt in stating that he was aware of the limitations for a partnership. He went on to say the contributions were not from the partnership, but from the 53 partners as stated in his letter, and the amounts were given in equal portion from each individual. He said the contributions were listed on the PAC reports from the partnership for bookkeeping purposes only and he was sure I could understand that.

I asked if the check issued to the PAC was drawn on the individuals' checks or the partnership's check. He sharply stated that it was the partnership check.

I again tried to explain that since the contributions were issued on partnership checks, the amounts exceeded the limit. Mr. Eastland said he didn't care what I thought and reiterated that the contributions from the partnership were itemized for bookkeeping purposes only. I asked him to hold on while I spoke to my supervisor.

After speaking to Mike Filler, I again tried to explain that we needed to have an itemization of the partners involved, if any contribution exceeded \$200. Mr. Eastland rudely responded that none exceeded \$200 and I could figure that out if I just divided 53 into the amounts shown. I then tried to explain that this problem may affect the committee's multicandidate status, but before I could finish explaining, Mr. Eastland disagreed and referred to a letter from the FEC stating they were qualified. At this point, Mr. Eastland sounded annoyed. He said that he would send in a list of the partners and then abruptly hung up the phone.

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B 5 0 4 0 5 3 1 0 7 1

WASHINGTON, D C OFFICE  
ANDREWS & KURTH  
1747 PENNSYLVANIA AVE., N.W.  
WASHINGTON, D C. 20006  
(202) 861-7400

ANDREWS & KURTH  
ATTORNEYS  
TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200  
TELECOPIER: (713) 220-4295  
TELEX: 79-1208

Attachment 11  
- 84 JAN 28 18:27  
DALLAS OFFICE  
ANDREWS, KURTH & RITCHIE,  
1100 REPUBLICBANK BUILDING  
DALLAS, TEXAS 75201  
- (214) 742-6285

January 23, 1984

Ms. Theresa Harley  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

RE: Your Identification Number C00089540

Dear Madam:

Reference is made to our correspondence dated October 5, 1983 and October 25, 1983 and recent subsequent telephone conversations in regard to the now named Andrews, Kurth Lawyers for America Committee, originally known as Citizens for America Committee. During the course of its existence it became a multi-candidate PAC consisting of all the partners in this law firm which has offices in Washington, D.C. and Dallas, besides the original office and main office in Houston. Each of the partners has agreed to and has and does contribute equally to the PAC. The law firm partnership as a partnership and as an entity has and does not contribute to this PAC; rather all of its partners, as such partners change from time to time, have contributed and do contribute to the PAC.

In the future it will be simple - or rather possible, not simple - to report that any contributions received and deposited to the bank account of the PAC are from the then partners in the law firm, and we can list the partners. In every case for every deposit all of the then active partners in the law firm contribute equally.

Attached is a list of all of the partners in this law firm, and therefore all of the members of and contributors to the PAC since its inception in the calendar year 1978 through the calendar year 1983.

Of course the partners change from time to time. For instance, our senior partner Harry R. Jones was a partner and did contribute in the calendar years 1978 and 1979, but has not

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Ms. Theresa Harley  
Page 2  
January 23, 1984

contributed in 1980 and subsequent years because he died and thus ceased to be a partner. Similarly, a present partner did not contribute in the years before he became a partner. In an instance where a partner resigned from the law firm and thus ceased to remain a partner, though he may have contributed while he was a partner, he no longer contributed after he ceased to be a partner.

Thus, you can look at the date of any contribution to the PAC and determine which partners contributed an equal amount to the total contribution.

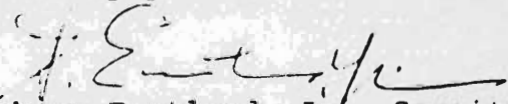
When the partners first formed the PAC, the partners' addresses in the Houston law office were at 2500 Exxon Building, Houston, Texas 77002 and after some date in late 1981 or early 1982 the law firm moved its offices to the then being completed new Texas Commerce Tower and from that date the official address of the law firm and all of its Houston partners and of the Houston PAC was and is 4200 Texas Commerce Tower, Houston, Texas 77002. On the attached list the Houston resident partners are marked with an asterisk (\*) for your easy and positive identification.

Similarly, the Dallas office of this law firm was opened in 1982 and the address of the partners resident in Dallas is 1100 RepublicBank Building, Dallas, Texas 75201. These partners are identified with a section sign (§). The Washington, D.C. partners have the Washington address of this law firm, which is 1747 Pennsylvania Avenue, N.W., Washington, D.C. 20006, and these partners are identified by a number sign (#).

As stated before, it is therefore evident that the amount involved for each individual is relatively modest and well below any ceiling in any respective calendar year or for any particular candidate.

We trust this answers your questions completely and that you have available, and this PAC has reported to the Commission, all contributions by all individuals.

Sincerely yours,

  
Seaborn Eastland, Jr., Committeeman  
Andrews, Kurth Lawyers for America  
Committee

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Attachment

1(17)

ANDREWS & KURTH  
PARTNER'S CONTRIBUTION TO PAC BY YEAR

NAME	CALENDAR YEARS					
	1978	1979	1980	1981	1982	1983
* Harry R. Jones	Y	Y	N	N	N	N
* Richard F. Burns	Y	Y	Y	Y	Y	Y
* W.M. Streetman	Y	Y	Y	Y	Y	N
\$ Robert Ritchie	N	N	N	N	Y	Y
* Milton H. West, Jr.	Y	Y	Y	Y	Y	Y
* Seaborn Eastland, Jr.	Y	Y	Y	Y	Y	Y
* Clinton F. Morse	Y	Y	Y	Y	Y	Y
* Donald E. Woodard	Y	Y	Y	Y	Y	Y
* Hall E. Timanus	Y	Y	Y	Y	Y	Y
* L.E. Frazier, Jr.	Y	Y	Y	Y	Y	Y
* William H. Tenison, Jr.	Y	Y	Y	Y	Y	Y
* Robert L. Bradley	Y	Y	Y	Y	Y	Y
* James W. Dilworth	Y	Y	Y	Y	Y	Y
* James A. Baker, III.	Y	Y	N	N	N	N
# Thomas F. Ryan, Jr.	Y	Y	Y	Y	Y	Y
* Bass C. Wallace	Y	Y	Y	Y	Y	Y
* Robert S. Weatherall	Y	Y	Y	Y	Y	Y
* Alfred H. Ebert, Jr.	Y	Y	Y	Y	Y	Y
* Paul E. Harris	Y	Y	Y	Y	Y	Y
# Michael F. Butler	Y	Y	Y	Y	Y	Y
* Jerry Van Kyle	Y	Y	Y	Y	Y	Y
* Laurence D. Sikes, Jr.	Y	Y	Y	Y	Y	Y
* Frank B. Davis	Y	Y	Y	Y	Y	Y
* Lee R. Larkin	Y	Y	Y	Y	Y	Y
\$ Byron F. Egan	N	N	N	N	Y	Y
* Bruce M. Harrington	Y	Y	Y	Y	Y	Y
* Thomas L. Healey	Y	Y	Y	Y	Y	Y
* James V. Carroll, III.	Y	Y	Y	Y	Y	Y
* P. Dexter Peacock	Y	Y	Y	Y	Y	Y
* John T. Cabaniss	Y	Y	Y	Y	Y	Y
* Fred M. Knapp, Jr.	Y	Y	Y	Y	Y	Y
* David G. Elkins	Y	Y	Y	Y	Y	Y
* William T. Miller	Y	Y	Y	Y	Y	Y
* Mark L. Thompson	Y	Y	Y	Y	Y	Y
* Larry B. Phillips, III.	Y	Y	Y	Y	Y	Y
* Hugh M. Ray	Y	Y	Y	Y	Y	Y
* Douglas Y. Bech	Y	Y	Y	Y	Y	Y
* Michael O. Rosenwasser	Y	Y	Y	Y	Y	Y
* Sam W. Cruse, Jr.	N	Y	Y	Y	Y	Y
* Thomas L. Schubert	N	N	Y	Y	Y	Y
* Taylor M. Hicks, Jr.	N	N	Y	Y	Y	Y
* Barry M. Miller	N	N	Y	Y	Y	Y
* Joel I. Shannon	N	N	Y	Y	Y	Y
* O. Clayton Lilienstern	N	N	Y	Y	Y	Y

- CONT. -

11/18)

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CALENDAR

NAME	1978	1979	1980	1981	1982	1983
# Robert G. Hardy	N	N	Y	Y	Y	Y
\$ Dennis Lutes	N	N	N	N	Y	Y
* Lawrence L. Bellatti	N	N	N	Y	Y	Y
* Clinton S. Morse	N	N	N	Y	N	N
* Terry Bell	N	N	N	N	Y	Y
* Douglas Clarke	N	N	N	N	Y	Y
* Edith Jones	N	N	N	N	Y	Y
* Richard Simms	N	N	N	N	Y	Y
* Denton Thomas	N	N	N	N	Y	Y
* Timothy Unger	N	N	N	N	Y	Y
* Mike Stuart	N	N	N	N	N	Y
# Bruce Coulombe	N	N	N	N	N	Y
* Thomas Perich	N	N	N	N	N	Y

Y - Did Participate

N - Did Not Participate

\* - Houston Office: Andrews & Kurth  
4200 Texas Commerce Tower  
Houston, Texas 77002

# - Washington, D.C. Office:  
Andrews & Kurth  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

\$ - Dallas Office: Andrews, Kurth & Ritchie  
1100 RepublicBank Building  
Dallas, Texas 75201



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Jerry V. Kyle, Treasurer  
Andrews, Kurth Lawyers  
for America Committee  
4200 Texas Commerce Tower  
Houston, Texas 77002

RE: MUR  
Andrews, Kurth Lawyers for America  
Committee; Jerry V. Kyle, as  
treasurer

Dear Mr. Kyle:

On , 1984, the Federal Election Commission determined that there is reason to believe the Andrews, Kurth Lawyers for America Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

Attachment 2(1)

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202)523-4057.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

85040531077

2(2)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Andrews, Kurth Lawyers  
for America Committee;  
Jerry V. Kyle, as treasurer

MUR \_\_\_\_\_

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

SUMMARY OF ALLEGATIONS

The Andrews, Kurth Lawyers for America Committee ("Committee") accepted excessive contributions totalling \$40,500 from a partnership, Andrews and Kurth, during the period of 1981 through 1983, in violation of 2 U.S.C. § 441a(f).

FACTUAL BASIS AND LEGAL ANALYSIS

Reports filed by the Committee during 1981 disclosed the receipt of \$7,500, \$10,000, and \$10,000 (an aggregate of \$27,500) from Andrews and Kurth on April 10, 1981, October 23, 1981, and November 3, 1981, respectively. The Committee's 1982 reports disclosed the receipt of \$6,000 and \$2,000 from Andrews and Kurth on June 3, 1982, and September 17, 1982, respectively. Andrews and Kurth is the connected organization of the Committee and a law firm comprised of numerous partners. On October 5, 1983, a Request for Additional Information ("RFAI") was mailed to the Committee concerning its 1981 and 1982 reports. The RFAI advised the Committee to refund the amount it received from Andrews and Kurth in excess of \$5,000 per calendar year. On October 27,

1983, a second notice was mailed to the Committee, the same day that the Committee submitted its response to the RFAI of October 5, 1983.

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The response submitted by the Committee states that it is a "PAC consisting of all of the partners in the law firm" and that "[e]ach of the partners has agreed and does contribute equally to the PAC." According to the response submitted, "funds are received by the PAC from time to time by one single check drawn on partnership funds, and then each individual partner's distribution account is charged for his or her equal contribution, which has been agreed to by each partner." The response continues on to state that between 1981 and 1983 the number of partners has "varied from not less than 47 and at present there are 53 partners." The response concludes that "the amount involved for each individual is relatively modest and well below any ceiling in any respective calendar year or for any particular election," and that "in the future we will be careful to identify on the reports that any deposits are from the partners in the law firm."

In response to a telephone conversation with a staff member of RAD, the Committee submitted further information on January 26, 1984. The Committee's letter stated that the "law firm partnership as a partnership and as an entity has and does not contribute to this PAC; rather all of its partners . . . have contributed and do contribute to the PAC." Accompanying the Committee's letter was a list of all of the partners in Andrews

2(4)



and Kurth which purportedly represents "all of the members of and contributors to the PAC since its inception in the calendar year 1978 through the calendar year 1983."

The General Counsel also notes that the Committee's 1983 reports disclose the receipt of \$5,000, \$5,000, and \$10,000 from Andrews and Kurth on April 21, 1983, October 13, 1983, and November 30, 1983, respectively.

The term "person" is defined at 2 U.S.C. § 431(11) to include a partnership.

Pursuant to 2 U.S.C. § 441a(a)(1)(C) no person shall make contributions to a political committee in any calendar year which, in the aggregate, exceed \$5,000 per calendar year. As set forth at 2 U.S.C. § 441a(f) no political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 441a.

The Commission's regulations at 11 C.F.R. § 110.1(e) state that a contribution by a partnership shall: (1) be attributed to each partner in direct proportion to his or her share of the partnership profits, according to instructions which shall be provided by the partnership to the committee or candidate; or (2) be attributed by agreement of the partners, as long as (i) only the profits of the partners to whom the contribution is attributed are reduced (or losses increased), and (ii) these partnership profits are reduced (or losses increased) in proportion to the contribution attributed to each of them; and, (3) not exceed the limits of § 110.1(a), (b), and (c).

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The evidence in hand indicates that the Committee and its treasurer have violated 2 U.S.C. § 441a(f) during 1981, 1982, and 1983 by accepting excessive contributions totalling \$40,500 from a partnership, Andrews and Kurth. In the General Counsel's view, the Committee's contention that it did not accept excessive contributions from Andrews and Kurth because the funds donated represent only the individual contributions of the firm's consenting partners and not "contributions" from the partnership itself, is without merit. The contributions at issue were made with partnership checks drawn on the partnership account. Although the contributions at issue count against the individual contribution limitation of each of the firm's consenting partners, the contributions also count against the partnership's limitation as a separate entity and a "person" under the Act. The Act and Commission regulations specifically limit contributions to a political committee that are drawn on partnership funds to \$5,000 per calendar year. See 2 U.S.C. § 441a(a)(1)(C) and 11 C.F.R. § 110.1(e)(3). In view of the foregoing, it is the recommendation of the General Counsel that the Commission find reason to believe Andrews, Kurth Lawyers for America Committee and Jerry V. Kyle, as treasurer, violated 2 U.S.C. § 441a(f).

2(6)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Andrews and Kurth  
Texas Commerce Tower  
Houston, Texas 77002

RE: MUR  
Andrews and Kurth

Dear Sir or Madam:

On , 1984, the Federal Election Commission determined that there is reason to believe Andrews and Kurth violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Andrews and Kurth. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against Andrews and Kurth, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

2(7)

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202)523-4057.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

85040531035

2(8)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Andrews and Kurth

MUR NO.

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

SUMMARY OF ALLEGATIONS

Andrews and Kurth, a partnership, made excessive contributions totalling \$40,500 to Andrews, Kurth Lawyers for America Committee ("Committee"), in violation of 2 U.S.C. § 441a(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

Reports filed by the Committee during 1981, 1982, and 1983, revealed the receipt of \$27,500, \$8,000, and \$20,000, respectively, from Andrews and Kurth, a partnership.

The term "person" is defined at 2 U.S.C. § 431(11) to include a partnership. Pursuant to 2 U.S.C. § 441a(a)(1)(C), no person shall make contributions to a political committee in any calendar year which, in the aggregate, exceed \$5,000 per calendar year.

The Commission's regulations at 11 C.F.R. § 110.1(e) state that a contribution by a partnership shall: (1) be attributed to each partner in direct proportion to his or her share of the partnership profits, according to instructions which shall be provided by the partnership to the committee or candidate; or (2) be attributed by agreement of the partners, as long as

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- The evidence in hand indicates that Andrews and Kurth have violated 2 U.S.C. § 441a(a)(1)(C) by contributing \$40,500 in excess of the contribution limitation to the Committee. The contributions at issue were made with partnership checks drawn on the partnership account. Although the contributions at issue count against the individual contribution limitation of each of the firm's consenting partners, the contributions also count against the partnership's limitation as a separate entity and a "person" under the Act. The Act and Commission regulations specifically limit contributions to a political committee that are drawn on partnership funds to \$5,000 per calendar year. See 2 U.S.C. § 441a(a)(1)(C) and 11 C.F.R. § 110.1(e)(3). It is, therefore, the recommendation of the General Counsel that there is reason to believe Andrews and Kurth have violated 2 U.S.C. § 441a(a)(1)(C).



FEDERAL ELECTION COMMISSION

1125 K STREET NW  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1669

Date Filmed 7/15/85 Camera No. --- 1

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 1669 .

85040553992

ANDREWS & KURTH  
ATTORNEYS  
1730 PENNSYLVANIA AVENUE, N.W.  
SUITE 700  
WASHINGTON, D.C. 20006  
(202) 662-2700  
TELEX: 78-1208  
TELECOPIER (202) 662-2739

TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200

August 7, 1985

4400 THANKSGIVING TOWER  
DALLAS, TEXAS 75201  
(214) 879-4400

Maura White  
Office of General Counsel  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR No. 1669, in re Andrews and Kurth et al.

Dear Ms. White:

As we discussed, enclosed is the missing page, entitled page 8 of 8 for the report covering January 1, 1983 through July 31, 1983.

Very truly yours,

*Michael F. Butler*  
Michael F. Butler

MFB:jac

Enclosure

RECEIVED  
GCC# P243-  
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85 AUG 9 10: 11  
ALL: 24  
GENERAL COUNSEL  
FEDERAL ELECTION COMMISSION

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 8 of 8 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

Any information copied from such Reports or 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.

Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Bass C. Wallace</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/21/83</b>	<b>Amount of Each Receipt this Period</b> <b>\$240.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 240.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Robert S. Weatherall</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/21/83</b>	<b>Amount of Each Receipt This Period</b> <b>190.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 190.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Milton H. West, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/21/83</b>	<b>Amount of Each Receipt This Period</b> <b>266.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 266.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b>  		<b>Name of Employer</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt This Period</b>  
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b>  	<b>Aggregate Year-to-Date—\$</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b>  		<b>Name of Employer</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt This Period</b>  
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b>  	<b>Aggregate Year-to-Date—\$</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b>  		<b>Name of Employer</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt This Period</b>  
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b>  	<b>Aggregate Year-to-Date—\$</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b>  		<b>Name of Employer</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt This Period</b>  
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b>  	<b>Aggregate Year-to-Date—\$</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>				<b>\$ 696.00</b>
<b>TOTAL This Period (last page this line number only)</b>				<b>\$10,000.00</b>

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ANDREWS & KURTH  
ATTORNEYS  
1747 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 861-7400  
TELEFAX 202-1208  
TELECOPIER (202) 861-7437

TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200

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4400 THANKSGIVING TOWER  
DALLAS, TEXAS 75201  
(214) 978-4400

July 12, 1985

Charles N. Steele, Esquire  
General Counsel  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D. C. 20463

Re: MUR No. 1669 In re Andrews & Kurth;  
Andrews, Kurth Lawyers for America  
Committee; Jerry V. Kyle, at treasurer

Dear Mr. Steele:

Pursuant to the settlement agreement in  
the above-entitled case, I enclose amended reports  
for the Andrews, Kurth lawyers for America Committee.

Very truly yours,

*Michael F. Butler*  
Michael F. Butler

ANDREWS & KURTH  
ATTORNEYS  
1747 PENNSYLVANIA AVENUE, N.W.  
SUITE 700  
WASHINGTON, D.C. 20006



Maura White  
Office of General Counsel  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

ANDREWS & KURTH  
ATTORNEYS  
1730 PENNSYLVANIA AVENUE, N.W.  
SUITE 700  
WASHINGTON, D.C. 20006  
(202) 662-2700  
TELEX: 79-1208  
TELECOPIER (202) 662-2739

TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
(713) 220-4200

4400 THANKSGIVING TOWER  
DALLAS, TEXAS 75201  
(214) 975-4400

August 7, 1985

RECEIVED  
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*White*  
Maura White  
Office of General Counsel  
Federal Election Commission  
Franklin Square North  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR No. 1669, in re Andrews and Kurth et al.

Dear Ms. White:

As we discussed, enclosed is the missing page, entitled page 8 of 8 for the report covering January 1, 1983 through July 31, 1983.

Very truly yours,

*Michael F. Butler*  
Michael F. Butler

MFB:jac

Enclosure

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GENERAL COUNSEL  
FEDERAL ELECTION COMMISSION

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# ITEMIZED RECEIPTS

Page 8 of 8 for  
 LINE NUMBER  
 (Use separate schedule for each  
 category of the Detailed  
 Summary Page)

Any information copied from such Reports or 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.

Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Bass C. Wallace</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 240.00</b>	<b>Date (month, day, year)</b>  <b>4/21/83</b>	<b>Amount of Each Receipt this Period</b>  <b>\$240.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Robert S. Weatherall</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 190.00</b>	<b>Date (month, day, year)</b>  <b>4/21/83</b>	<b>Amount of Each Receipt This Period</b>  <b>190.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Milton H. West, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 266.00</b>	<b>Date (month, day, year)</b>  <b>4/21/83</b>	<b>Amount of Each Receipt This Period</b>  <b>266.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b>    Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>  <b>Aggregate Year-to-Date—\$</b>	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>E. Full Name, Mailing Address and ZIP Code</b>    Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>  <b>Aggregate Year-to-Date—\$</b>	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>F. Full Name, Mailing Address and ZIP Code</b>    Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>  <b>Aggregate Year-to-Date—\$</b>	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>G. Full Name, Mailing Address and ZIP Code</b>    Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>  <b>Aggregate Year-to-Date—\$</b>	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$ 696.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			<b>\$10,000.00</b>

85040553997



(Summary Page)

85 JUL 15 1985 12

**1. Name of Committee (In Full)**  
ANDREWS, KURTH LAWYERS  
FOR AMERICA COMMITTEE

---

**Address (Number and Street)**  
4200 Texas Commerce Tower

---

**City, State and ZIP Code**  
Houston, Texas 77002

---

☐ Check here if address is different than previously reported.

---

**2. FEC Identification Number**  
C00089540

---

**3.** ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

**4. TYPE OF REPORT (Check appropriate boxes)**

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☐ January 31 Year End Report  
☒ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?  
☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
<b>5. Covering Period</b> January 1, 1983 through July 31, 1983			
<b>6. (a) Cash on hand January 1, 1983</b> .....			\$ 139.30
<b>(b) Cash on Hand at Beginning of Reporting Period</b> .....	\$ 139.30		
<b>(c) Total Receipts (from Line 18)</b> .....	\$ 10,000.00	\$ 10,000.00	
<b>(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)</b> .....	\$ 10,139.30	\$ 10,139.30	
<b>7. Total Disbursements (from Line 28)</b> .....	\$ 7,500.00	\$ 7,500.00	
<b>8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))</b> .....	\$ 2,639.30	\$ 2,639.30	
<b>9. Debts and Obligations Owed TO The Committee</b> .....	\$ - - - - -		
(Itemize all on Schedule C or Schedule D)			
<b>10. Debts and Obligations Owed BY the Committee</b> .....	\$ - - - - -		
(Itemize all on Schedule C or Schedule D)			

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

Jerry V. Kyle  
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

May 23, 1985  
Date

For further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-523-4068

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 3 and FEC FORM 3a are obsolete and should no longer be used.

										FEC FORM 3X (3/80)
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## ITEMIZED RECEIPTS

LINE NUMBER \_\_\_\_\_  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

Any information supplied from such Reports or 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.

Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Douglas Y. Bech 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt this Period</b> \$236.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$</b> 236.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> R. Terry Bell 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 113.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$</b> 113.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> Lawrence L. Bellatti 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 134.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$</b> 134.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Robert L. Bradley 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 119.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$</b> 119.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Richard F. Burns 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 56.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$</b> 56.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> Michael F. Butler 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 236.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$</b> 236.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> John T. Cabaniss 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 245.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$</b> 245.00		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$1,139.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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## ITEMIZED RECEIPTS

LINE NUMBER \_\_\_\_\_  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

Any information copied from such Reports or 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.

Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>James V. Carroll, III</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/21/83</b>	<b>Amount of Each Receipt this Period</b> <b>\$250.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 250.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Douglas E. Clarke</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/21/83</b>	<b>Amount of Each Receipt This Period</b> <b>113.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 113.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Bruce R. Coulombe</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/21/83</b>	<b>Amount of Each Receipt This Period</b> <b>86.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 86.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Sam W. Cruse, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/21/83</b>	<b>Amount of Each Receipt This Period</b> <b>220.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 220.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Frank B. Davis</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/21/83</b>	<b>Amount of Each Receipt This Period</b> <b>250.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 250.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>James W. Dilworth</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/21/83</b>	<b>Amount of Each Receipt This Period</b> <b>279.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 279.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Seaborn Eastland, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/21/83</b>	<b>Amount of Each Receipt This Period</b> <b>108.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 108.00</b>	
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>				<b>\$1,306.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>				

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ITEMIZED RECEIPTS

Any information copied from such Reports or 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.

Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE

<b>A. Full Name, Mailing Address and ZIP Code</b> Alfred H. Ebert, Jr. 4200 Texas Commerce Tower Houston, Texas	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt this Period</b> \$279.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 279.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> Byron F. Egan 4400 Thanksgiving Tower Dallas, Texas 75201	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 240.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 240.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> David G. Elkins 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 240.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 240.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> L. E. Frazier 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 245.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 245.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Robert G. Hardy 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 200.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 200.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> Bruce M. Harrington 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 124.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 124.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> Paul E. Harris 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 279.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 279.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$1,607.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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ITEMIZED RECEIPTS

Page 4 of 5 for  
LINE NUMBER  
(Use separate schedule(s) for each  
category of the Detailed  
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Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE

<b>A. Full Name, Mailing Address and ZIP Code</b> Thomas L. Healey 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt this Period</b> \$250.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$250.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> Taylor M. Hicks, Jr. 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 200.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$200.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> Edith H. Jones 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 113.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$113.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> Fred M. Knapp, Jr. 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 245.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$245.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> Jerry V. Kyle 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 236.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$236.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> Lee R. Larkin 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 240.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$240.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> O. CLayton Lilienstern 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83	<b>Amount of Each Receipt This Period</b> 200.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$200.00</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>				<b>\$1,484.00</b>
<b>TOTAL This Period (last page this line number only)</b>				

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Name of Committee (in Full)  
**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

A. Full Name, Mailing Address and ZIP Code <b>Dennis L. Lutes 4400 Thanksgiving Tower Dallas, Texas 75201</b>	Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>	Amount of Each Receipt this Period <b>\$162.00</b>
	Occupation <b>Attorney</b>		
	Aggregate Year-to-Date—\$ <b>162.00</b>		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
B. Full Name, Mailing Address and ZIP Code <b>Barry R. Miller 4200 Texas Commerce Tower Houston, Texas 77002</b>	Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>	Amount of Each Receipt This Period <b>200.00</b>
	Occupation <b>Attorney</b>		
	Aggregate Year-to-Date—\$ <b>200.00</b>		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
C. Full Name, Mailing Address and ZIP Code <b>William T. Miller 4200 Texas Commerce Tower Houston, Texas 77002</b>	Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>	Amount of Each Receipt This Period <b>236.00</b>
	Occupation <b>Attorney</b>		
	Aggregate Year-to-Date—\$ <b>236.00</b>		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
D. Full Name, Mailing Address and ZIP Code <b>Clinton F. Morse 4200 Texas Commerce Tower Houston, Texas 77002</b>	Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>	Amount of Each Receipt This Period <b>245.00</b>
	Occupation <b>Attorney</b>		
	Aggregate Year-to-Date—\$ <b>245.00</b>		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
E. Full Name, Mailing Address and ZIP Code <b>P. Dexter Peacock 4200 Texas Commerce Tower Houston, Texas 77002</b>	Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>	Amount of Each Receipt This Period <b>245.00</b>
	Occupation <b>Attorney</b>		
	Aggregate Year-to-Date—\$ <b>245.00</b>		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
F. Full Name, Mailing Address and ZIP Code <b>Thomas J. Perich 4200 Texas Commerce Tower Houston, Texas 77002</b>	Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>	Amount of Each Receipt This Period <b>86.00</b>
	Occupation <b>Attorney</b>		
	Aggregate Year-to-Date—\$ <b>86.00</b>		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
G. Full Name, Mailing Address and ZIP Code <b>Larry B. Phillips, III 4200 Texas Commerce Tower Houston, Texas 77002</b>	Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>	Amount of Each Receipt This Period <b>210.00</b>
	Occupation <b>Attorney</b>		
	Aggregate Year-to-Date—\$ <b>210.00</b>		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
SUBTOTAL of Receipts This Page (optional) . . . . .			<b>1,384.00</b>
TOTAL This Period (last page this line number only) . . . . .			

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Name of Committee (in Full) <b>ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE</b>			
A. Full Name, Mailing Address and ZIP Code <b>Hugh M. Ray 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt this Period <b>\$236.00</b>
		Aggregate Year-to-Date-\$236.00	
B. Full Name, Mailing Address and ZIP Code <b>Robert F. Ritchie 4400 Thanksgiving Tower Dallas, Texas 75201</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>56.00</b>
		Aggregate Year-to-Date-\$56.00	
C. Full Name, Mailing Address and ZIP Code <b>Michael Q. Rosenwasser 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>236.00</b>
		Aggregate Year-to-Date-\$236.00	
D. Full Name, Mailing Address and ZIP Code <b>Thomas F. Ryan, Jr. 1747 Pennsylvania Avenue, N.W. Washington D.C. 20006</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>279.00</b>
		Aggregate Year-to-Date-\$279.00	
E. Full Name, Mailing Address and ZIP Code <b>Thomas L. Schubert 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>200.00</b>
		Aggregate Year-to-Date-\$200.00	
F. Full Name, Mailing Address and ZIP Code <b>Joel I. Shannon 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>200.00</b>
		Aggregate Year-to-Date-\$200.00	
G. Full Name, Mailing Address and ZIP Code <b>Laurence D. Sikes, Jr. 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>4/21/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>250.00</b>
		Aggregate Year-to-Date-\$250.00	
SUBTOTAL of Receipts This Page (optional) . . . . .			<b>\$1,457.00</b>
TOTAL This Period (last page this line number only) . . . . .			

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Any information copied from such Reports or 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.			
Name of Committee (in Full) <b>ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE</b>			
<b>A. Full Name, Mailing Address and ZIP Code</b> Richard S. Simms 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	
		<b>Aggregate Year-to-Date--\$</b> 113.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Michael Stuart 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	
		<b>Aggregate Year-to-Date--\$</b> 86.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> William H. Tenison, Jr. 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	
		<b>Aggregate Year-to-Date--\$</b> 158.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Hall E. Timanus 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	
		<b>Aggregate Year-to-Date--\$</b> 108.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Denton N. Thomas 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	
		<b>Aggregate Year-to-Date--\$</b> 113.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Marcus L. Thompson 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	
		<b>Aggregate Year-to-Date--\$</b> 236.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> Timothy J. Unger 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/21/83
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	
		<b>Aggregate Year-to-Date--\$</b> 113.00	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$</b> 927.00
<b>TOTAL This Period (last page this line number only)</b>			

85040554005

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

(Summary Page)

ALIGN AREA

1. Name of Committee (In Full)

ANDREWS, KURIH LAWYERS FOR  
AMERICA COMMITTEE

Address (Number and Street)

2500 Exxon Building

City, State and ZIP Code

Houston, Texas 77002

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 00089540

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☒ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

(b) Is this Report an Amendment?

☒ YES ☐ NO

**SUMMARY**

5. Covering Period 1/1/81 through 6/30/81

6. (a) Cash on hand January 1, 1981 .....

(b) Cash on Hand at Beginning of Reporting Period .....

(c) Total Receipts (from Line 18) .....

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28) .....

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....

9. Debts and Obligations Owed TO The Committee .....

(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee .....

(Itemize all on Schedule C or Schedule D)

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

Jerry V. Kyle

Type or Print Name of Treasurer

5/23/85

Date

SIGNATURE OF TREASURER

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

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 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

35040554006

# ITEMIZED RECEIPTS

Page 1 of 1  
 LINE NUMBER  
 (Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports or 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.

Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR AMERICA

<b>A. Full Name, Mailing Address and ZIP Code</b> James A. Baker, III 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 72.00	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt this Period</b> \$ 72.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Douglas Y. Bech 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 153.00	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 153.00
<b>C. Full Name, Mailing Address and ZIP Code</b> Lawrence Bellatti 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 91.00	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 91.00
<b>D. Full Name, Mailing Address and ZIP Code</b> Robert L. Bradley 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 195.00	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 195.00
<b>E. Full Name, Mailing Address and ZIP Code</b> Richard F. Burns 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 64.00	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 64.00
<b>F. Full Name, Mailing Address and ZIP Code</b> Michael F. Butler 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 174.00	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 174.00
<b>G. Full Name, Mailing Address and ZIP Code</b> John T. Cabaniss 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 193.00	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 193.00
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$942.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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Name of Committee (in Full)  
**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> James V. Carroll, III 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt this Period</b>  <b>\$202.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 202.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> Sam W. Cruse, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b>  <b>135.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 135.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> Frank B. Davis 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b>  <b>205.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 205.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> James W. Dilworth 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b>  <b>225.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 225.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Seaborn Eastland, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b>  <b>175.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 175.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> Alfred H. Ebert, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b>  <b>225.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 225.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> David G. Elkins 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b>  <b>183.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 183.00</b>		
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$1,350.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

54000

# ITEMIZED RECEIPTS

Page 3 of 3 for  
LINE NUMBER  
(Use separate schedule for each  
category of the Detailed  
Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>L. E. Frazier, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt this Period</b> <b>\$225.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 225.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Robert G. Hardy</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>117.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 117.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Bruce M. Harrington</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>166.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 166.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Paul E. Harris</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>225.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 225.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Thomas L. Healey</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>202.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 202.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Taylor M. Hicks, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>117.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 117.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>John C. Kerr</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>		<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>95.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 95.00</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>				<b>\$1,147.00</b>
<b>TOTAL This Period (last page this line number only)</b>				

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Name of Committee (in Full)

**ANDREWS, KURTH LAWERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Fred M. Knapp, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt this Period</b> <b>\$193.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 193.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Jerry V. Kyle</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>202.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 202.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Lee R. Larkin</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>202.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 202.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>O. Clayton Lilienstern</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>117.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 117.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Barry R. Miller</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>117.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 117.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>William T. Miller</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>175.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 175.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Clinton F. Morse</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b> <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b> <b>225.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 225.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$1,231.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

35040554010

ITEMIZED RECEIPTS

Page 5 of 7  
LINE NUMBER  
(Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE

<b>A. Full Name, Mailing Address and ZIP Code</b> Clinton S. Morse 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt this Period</b> \$ 95.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 95.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> P. Dexter Peacock 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 193.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 193.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> Larry B. Phillips, III 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 140.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 140.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> Hugh M. Ray 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 136.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 136.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Michael Q. Rosenwasser 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 174.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 174.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> Thomas F. Ryan, Jr. 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 225.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 225.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> Thomas L. Schubert 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 117.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 117.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$1,080.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

15040554011

ITEMIZED RECEIPTS

Page 1 of 1  
LINE NUMBER  
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE

<b>A. Full Name, Mailing Address and ZIP Code</b> Joel I. Shannon 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt this Period</b> \$117.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date--\$ 117.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> Laurence D. Sikes 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 205.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date--\$ 205.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> W. M. Streetman 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 64.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date--\$ 64.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> William H. Tenison, Jr. 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 169.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date--\$ 169.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> Marcus L. Thompson 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 148.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date--\$ 148.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> Hall E. Timanus 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 175.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date--\$ 175.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> Bass C. Wallace 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 4/10/81	<b>Amount of Each Receipt This Period</b> 190.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date--\$ 190.00</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>				<b>\$1,068.00</b>
<b>TOTAL This Period (last page this line number only)</b>				

35040124012



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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Robert S. Weatherall</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>4/10/81</b>	<b>Amount of Each Receipt this Period</b>  <b>\$202.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 202.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Milton H. West, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b>  <b>275.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 275.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Donald E. Woodard</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>4/10/81</b>	<b>Amount of Each Receipt This Period</b>  <b>205.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 205.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b>   	<b>Name of Employer</b>   <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b>   	<b>Name of Employer</b>   <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b>   	<b>Name of Employer</b>   <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b>   	<b>Name of Employer</b>   <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$ 682.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			<b>\$7,500.00</b>

35040554013

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

(Summary Page)

ALIGN AREA

RECEIVED AT THE FEC 9:12

1. Name of Committee (In Full)

ANDREWS, KURTH LAWYERS  
FOR AMERICA COMMITTEE

Address (Number and Street)

4200 TEXAS COMMERCE TOWER

City, State and ZIP Code

HOUSTON, TEXAS 77002

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 00089540

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

- (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☒ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?

☒ YES ☐ NO

**SUMMARY**

5. Covering Period July 1, 1981 through December 31, 1981

6. (a) Cash on hand January 1, 19 81

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D)

**COLUMN A  
This Period**

**COLUMN B  
Calendar Year-to-Date**

\$ 650.00

\$ 6,150.00

\$ 20,000.00

\$ 27,500.00

\$ 26,150.00

\$ 28,150.00

\$ 20,250.00

\$ 22,250.00

\$ 5,900.00

\$ 5,900.00

\$ - 0 -

\$ - 0 -

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

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

JERRY V. KYLE

Type or Print Name of Treasurer

May 23, 1985

Date

SIGNATURE OF TREASURER

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 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 7 for  
**LINE NUMBER**  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full) <b>ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE</b>			
A. Full Name, Mailing Address and ZIP Code <b>Douglas Y. Bech 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>10/23/81</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt this Period <b>\$242.00</b>
		Aggregate Year-to-Date-\$ <b>395.00</b>	
B. Full Name, Mailing Address and ZIP Code <b>Lawrence Bellatti 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>10/23/81</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>141.00</b>
		Aggregate Year-to-Date-\$ <b>232.00</b>	
C. Full Name, Mailing Address and ZIP Code <b>Robert L. Bradley 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>10/23/81</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>222.00</b>
		Aggregate Year-to-Date-\$ <b>417.00</b>	
D. Full Name, Mailing Address and ZIP Code <b>Richard F. Burns 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>10/23/81</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>76.00</b>
		Aggregate Year-to-Date-\$ <b>140.00</b>	
E. Full Name, Mailing Address and ZIP Code <b>Michael F. Butler 1747 Pennsylvania, N.W. Washington, D.C. 20006</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>10/23/81</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>233.00</b>
		Aggregate Year-to-Date-\$ <b>407.00</b>	
F. Full Name, Mailing Address and ZIP Code <b>John T. Cabaniss 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>10/23/81</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>267.00</b>
		Aggregate Year-to-Date-\$ <b>460.00</b>	
G. Full Name, Mailing Address and ZIP Code <b>James V. Carroll 1747 Pennsylvania, N.W. Washington, D.C. 20006</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>10/23/81</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>273.00</b>
		Aggregate Year-to-Date-\$ <b>475.00</b>	
SUBTOTAL of Receipts This Page (optional) . . . . .			<b>\$1,454.00</b>
TOTAL This Period (last page this line number only) . . . . .			

85040554015

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 2 of 2  
**LINE NUMBER**  
 (Use separate schedule for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Sam W. Cruse, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt this Period</b> \$202.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 337.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> Frank B. Davis 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 277.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 482.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> James W. Dilworth 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 279.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 504.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Seaborn Eastland, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 200.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 375.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Alfred H. Ebert, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 301.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 526.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> David G. Elkins 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 253.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 436.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> L. E. Frazier 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 301.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 526.00		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$1,813.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

35040554016

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 3 of 7 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule(s) for each  
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 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURIH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Robert G. Hardy</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 295.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt this Period</b>  <b>\$178.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Bruce M. Harrington</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 390.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>224.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Paul E. Harris</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 526.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>301.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Thomas L. Healey</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date—\$ 475.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>273.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Taylor M. Hicks, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 295.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>178.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Fred M. Knapp, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 457.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>264.00</b>
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Jerry V. Kyle</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 475.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>273.00</b>
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$1,691.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

85040554017



**SCHEDULE A**

**ITEMIZED RECEIPTS**

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Name of Committee (in Full)  
**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Lee R. Larkin</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 475.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt this Period</b>  <b>\$273.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>O. Clayton Lilienstern</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 295.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>178.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Barry M. Miller</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 295.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>178.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>William T. Miller</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 417.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>242.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Clinton F. Morse</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 526.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>301.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Clinton S. Morse</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 241.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>146.00</b>
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>P. Dexter Peacock</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 460.00</b>	<b>Date (month, day, year)</b>  <b>10/23/81</b>	<b>Amount of Each Receipt This Period</b>  <b>267.00</b>
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$1,585.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

350405134013

**SCHEDULE A**

**ITEMIZED RECEIPTS**

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**LINE NUMBER**  
 (Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Larry B. Phillips, III 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 342.00	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt this Period</b> \$202.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Hugh M. Ray 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 338.00	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 202.00
<b>C. Full Name, Mailing Address and ZIP Code</b> Michael Q. Rosenwasser 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 416.00	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 242.00
<b>D. Full Name, Mailing Address and ZIP Code</b> Thomas F. Ryan, Jr. 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 526.00	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 301.00
<b>E. Full Name, Mailing Address and ZIP Code</b> Thomas L. Schubert 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 295.00	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 178.00
<b>F. Full Name, Mailing Address and ZIP Code</b> Joel I. Shannon 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 295.00	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 178.00
<b>G. Full Name, Mailing Address and ZIP Code</b> Laurence D. Sikes 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 482.00	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 277.00
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$1,580.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

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**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURT AMERICAN LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> W. M. Streetman 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt this Period</b> \$ 76.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 140.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> William H. Tenison, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 223.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 392.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> Marcus L. Thompson 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 212.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 360.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> Hall E. Timanus 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 200.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 375.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Bass C. Wallace 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 262.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 452.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> Robert S. Weatherall 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 264.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 466.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> Milton H. West, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/23/81	<b>Amount of Each Receipt This Period</b> 365.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 640.00</b>		
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$ 1,602.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

3504054020

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**ITEMIZED RECEIPTS**

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Donald E. Woodard 4200 Texas Commerce Tower Houston, Texas 77002		Name of Employer <b>Self-employed</b>	Date (month, day, year) 10/23/81	Amount of Each Receipt this Period \$275.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Aggregate Year-to-Date-\$ 480.00	
<b>B. Full Name, Mailing Address and ZIP Code</b>		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
<b>C. Full Name, Mailing Address and ZIP Code</b>		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
<b>D. Full Name, Mailing Address and ZIP Code</b>		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
<b>E. Full Name, Mailing Address and ZIP Code</b>		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
<b>F. Full Name, Mailing Address and ZIP Code</b>		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
<b>G. Full Name, Mailing Address and ZIP Code</b>		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
<b>SUBTOTAL of Receipts This Page (optional)</b>				\$ 275.00
<b>TOTAL This Period (last page this line number only)</b>				\$10,000.00

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Douglas Y. Bech 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt this Period</b> \$242.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 637.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Lawrence Bellatti 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 141.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 373.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Robert L. Bradley 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 222.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 639.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Richard F. Burns 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 76.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 216.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Michael F. Butler 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 233.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 640.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> John T. Cabaniss 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 267.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 727.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> James V. Carroll 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 273.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 748.00	
<b>SUBTOTAL of Receipts This Page (optional)</b> . . . . .			<b>\$1,454.00</b>
<b>TOTAL This Period (last page this line number only)</b> . . . . .			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Sam W. Cruse, Jr. 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 539.00	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt this Period</b> \$202.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Frank B. Davis 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 759.00	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 277.00
<b>C. Full Name, Mailing Address and ZIP Code</b> James W. Dilworth 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 783.00	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 279.00
<b>D. Full Name, Mailing Address and ZIP Code</b> Seaborn Eastland, Jr. 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 575.00	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 200.00
<b>E. Full Name, Mailing Address and ZIP Code</b> Alfred H. Ebert, Jr. 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 827.00	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 301.00
<b>F. Full Name, Mailing Address and ZIP Code</b> David G. ELkins 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 689.00	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 253.00
<b>G. Full Name, Mailing Address and ZIP Code</b> L. E. Frazier, Jr. 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 827.00	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 301.00
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$1,813.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

350405154023



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 3 of 7 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Robert G. Hardy</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/03/81</b>	<b>Amount of Each Receipt this Period</b> <b>\$178.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
	<b>Aggregate Year-to-Date—\$ 473.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Bruce M. Harrington</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/03/81</b>	<b>Amount of Each Receipt This Period</b> <b>224.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
	<b>Aggregate Year-to-Date—\$ 614.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Paul E. Harris</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/03/81</b>	<b>Amount of Each Receipt This Period</b> <b>301.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
	<b>Aggregate Year-to-Date—\$ 827.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Thomas L. Healey</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/03/81</b>	<b>Amount of Each Receipt This Period</b> <b>273.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
	<b>Aggregate Year-to-Date—\$ 748.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Taylor M. Hicks, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/03/81</b>	<b>Amount of Each Receipt This Period</b> <b>178.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
	<b>Aggregate Year-to-Date—\$ 473.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Fred M. Knapp, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/03/81</b>	<b>Amount of Each Receipt This Period</b> <b>264.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
	<b>Aggregate Year-to-Date—\$ 721.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Jerry V. Kyle</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/03/81</b>	<b>Amount of Each Receipt This Period</b> <b>273.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
	<b>Aggregate Year-to-Date—\$ 748.00</b>		
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$1,691.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

85040554024

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 4 of 7 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Lee R. Larkin 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt this Period</b> \$273.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 748.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> O. Clay Lillienstern 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 178.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 473.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Barry R. Miller 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 178.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 473.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> William T. Miller 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 242.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 659.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Clinton F. Morse 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 301.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 827.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Clinton S. Morse 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 146.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 387.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> P. Dexter Peacock 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 267.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 727.00	
<b>SUBTOTAL of Receipts This Page (optional)</b> . . . . .				<b>\$1,585.00</b>
<b>TOTAL This Period (last page this line number only)</b> . . . . .				

85040554025

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 3 of 7 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Larry B. Phillips, III 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt this Period</b> \$202.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 544.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> Hugh M. Ray 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 202.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 540.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> Michael Q. Rosenwasser 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 242.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 658.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Thomas F. Ryan, Jr. 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 301.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 827.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Thomas L. Schubert 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 178.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 473.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> Joel I. Shannon 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 178.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 473.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> Laurence D. Sikes 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt This Period</b> 277.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 759.00		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$1,580.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040554026



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 6 of 7 to  
**LINE NUMBER**  
 (Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURIH LAWYERS FOR AMERICA**

A. Full Name, Mailing Address and ZIP Code

**W. M. Streetman  
 4200 Texas Commerce Tower  
 Houston, Texas 77002**

Name of Employer

**Self-employed**

Date (month, day, year)

**11/03/81**

Amount of Each Receipt this Period

**\$ 76.00**

Occupation  
**Attorney**

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

**Aggregate Year-to-Date-\$ 216.00**

B. Full Name, Mailing Address and ZIP Code

**William H. Tenison, Jr.  
 4200 Texas Commerce Tower  
 Houston, Texas 77002**

Name of Employer

**Self-employed**

Date (month, day, year)

**11/03/81**

Amount of Each Receipt This Period

**223.00**

Occupation  
**Attorney**

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

**Aggregate Year-to-Date-\$ 615.00**

C. Full Name, Mailing Address and ZIP Code

**Marcus L. Thompson  
 4200 Texas Commerce Tower  
 Houston, Texas 77002**

Name of Employer

**Self-employed**

Date (month, day, year)

**11/03/81**

Amount of Each Receipt This Period

**212.00**

Occupation  
**Attorney**

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

**Aggregate Year-to-Date-\$ 572.00**

D. Full Name, Mailing Address and ZIP Code

**Hall E. Timanus  
 4200 Texas Commerce Tower  
 Houston, Texas 77002**

Name of Employer

**Self-employed**

Date (month, day, year)

**11/03/81**

Amount of Each Receipt This Period

**200.00**

Occupation  
**Attorney**

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

**Aggregate Year-to-Date-\$ 575.00**

E. Full Name, Mailing Address and ZIP Code

**Bass C. Wallace  
 4200 Texas Commerce Tower  
 Houston, Texas 77002**

Name of Employer

**Self-employed**

Date (month, day, year)

**11/03/81**

Amount of Each Receipt This Period

**262.00**

Occupation  
**Attorney**

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

**Aggregate Year-to-Date-\$ 714.00**

F. Full Name, Mailing Address and ZIP Code

**Robert S. Weatherall  
 4200 Texas Commerce Tower  
 Houston, Texas 77002**

Name of Employer

**Self-employed**

Date (month, day, year)

**11/03/81**

Amount of Each Receipt This Period

**264.00**

Occupation  
**Attorney**

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

**Aggregate Year-to-Date-\$ 730.00**

G. Full Name, Mailing Address and ZIP Code

**Milton H. West, Jr.  
 4200 Texas Commerce Tower  
 Houston, Texas 77002**

Name of Employer

**Self-employed**

Date (month, day, year)

**11/03/81**

Amount of Each Receipt This Period

**365.00**

Occupation  
**Attorney**

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

**Aggregate Year-to-Date-\$ 1005.00**

**SUBTOTAL of Receipts This Page (optional)**

**\$1,602.00**

**TOTAL This Period (last page this line number only)**

35040554027



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 7 of 7 for  
 LINE NUMBER \_\_\_\_\_  
 (Use separate schedule(s) for each  
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 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Donald E. Woodard 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/03/81	<b>Amount of Each Receipt this Period</b> \$275.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b> 755.00	
<b>B. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$ 275.00</b>
<b>TOTAL This Period (last page this line number only)</b>			<b>\$10,000.00</b>

85040554028

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

(Summary Page)

85 JUN 15 1985 SIGNATURE 2

ALIGN AREA

1. Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR  
AMERICA COMMITTEE

Address (Number and Street)

4200 TEXAS COMMERCE TOWER

City, State and ZIP Code

HOUSTON, TEXAS 77002

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00089540

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

- (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☒ July 15 Quarterly Report ☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?

☒ YES ☐ NO

**SUMMARY**

5. Covering Period April 1, 1982 through June 30, 1982

6. (a) Cash on hand January 1, 19 82 .....

(b) Cash on Hand at Beginning of Reporting Period .....

(c) Total Receipts (from Line 18) .....

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28) .....

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....

9. Debts and Obligations Owed TO The Committee .....

(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee .....

(Itemize all on Schedule C or Schedule D)

COLUMN A  
This Period

COLUMN B  
Calendar Year-to-Date

	\$ 5,900.00
\$ 3,250.00	
\$ 6,000.00	\$ 6,000.00
\$ 9,250.00	\$ 11,900.00
\$ 6,150.00	\$ 8,800.00
\$ 3,100.00	\$ 3,100.00
\$ - 0 -	
\$ - 0 -	

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

JERRY V. KYLE

Type or Print Name of Treasurer

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-623-4068

May 23, 1985

Date

SIGNATURE OF TREASURER

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 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

85040554029

# SCHEDULE A

# ITEMIZED RECEIPTS

(Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE

<b>A. Full Name, Mailing Address and ZIP Code</b> Douglas Bech 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 142.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt this Period</b> \$ 142.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Terry Bell 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 52.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 52.00
<b>C. Full Name, Mailing Address and ZIP Code</b> Lawrence Bellatti 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 82.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 82.00
<b>D. Full Name, Mailing Address and ZIP Code</b> Robert L. Bradley 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 96.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 96.00
<b>E. Full Name, Mailing Address and ZIP Code</b> Richard F. Burns 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed Attorney <b>Occupation</b> Aggregate Year-to-Date-\$ 36.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 36.00
<b>F. Full Name, Mailing Address and ZIP Code</b> Michael F. Butler 1747 Pennsylvania Avenue, N.W. Washington, D. C. 20006 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 139.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 139.00
<b>G. Full Name, Mailing Address and ZIP Code</b> John T. Cabaniss 4200 Texas Commerce Tower Houston, Texas 77002 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 147.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 147.00
<b>SUBTOTAL of Receipts This Page (optional)</b>			694.00
<b>TOTAL This Period (last page this line number only)</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
James V. Carroll, III 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	Self-employed	6/3/82	\$149.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>Attorney</b>	Aggregate Year-to-Date-\$ 149.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Douglas Clarke 4200 Texas Commerce Tower Houston, Texas 77002	Self-employed	6/3/82	52.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>Attorney</b>	Aggregate Year-to-Date-\$ 52.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Sam Cruse, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	Self-employed	6/3/82	123.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>Attorney</b>	Aggregate Year-to-Date-\$ 123.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Frank B. Davis 4200 Texas Commerce Tower Houston, Texas 77002	Self-employed	6/3/82	144.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>Attorney</b>	Aggregate Year-to-Date-\$ 144.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
James W. Dilworth 4200 Texas Commerce Tower Houston, Texas 77002	Self-employed	6/3/82	152.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>Attorney</b>	Aggregate Year-to-Date-\$ 152.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Seaborn Eastland, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	Self-employed	6/3/82	86.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>Attorney</b>	Aggregate Year-to-Date-\$ 86.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Alfred H. Ebert, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	Self-employed	6/3/82	164.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>Attorney</b>	Aggregate Year-to-Date-\$ 164.00	
SUBTOTAL of Receipts This Page (optional) . . . . .			870.00
TOTAL This Period (last page this line number only) . . . . .			

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## SCHEDULE A

## ITEMIZED RECEIPTS

LINE NUMBER  
(Use separate schedule(s) for each  
category of the Detailed  
Summary Page)

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Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR AFRICA COMMITTEE

<b>A. Full Name, Mailing Address and ZIP Code</b> Byron F. Egan 4400 Thanksgiving Tower Dallas, Texas 75201	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt this Period</b> \$144.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
		<b>Aggregate Year-to-Date—\$ 144.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> David G. Elkins 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 144.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
		<b>Aggregate Year-to-Date—\$ 144.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> L. E. Frazier, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 147.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
		<b>Aggregate Year-to-Date—\$ 147.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> Robert G. Hardy 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 111.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
		<b>Aggregate Year-to-Date—\$ 111.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> Bruce M. Harrington 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 90.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
		<b>Aggregate Year-to-Date—\$ 90.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> Paul E. Harris 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 164.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
		<b>Aggregate Year-to-Date—\$ 164.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> Thomas L. Healey 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 149.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
		<b>Aggregate Year-to-Date—\$ 149.00</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>949.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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## SCHEDULE A

## ITEMIZED RECEIPTS

LINE NUMBER  
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Name of Committee (in Full)

**ANDREWS, KURTZ LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Taylor M. Hicks 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 111.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt this Period</b> \$111.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Edith H. Jones 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 52.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 52.00
<b>C. Full Name, Mailing Address and ZIP Code</b> Fred M. Knapp, Jr. 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 147.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 147.00
<b>D. Full Name, Mailing Address and ZIP Code</b> Jerry V. Kyle 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 144.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 144.00
<b>E. Full Name, Mailing Address and ZIP Code</b> Lee R. Larkin 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 144.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 144.00
<b>F. Full Name, Mailing Address and ZIP Code</b> O. Clayton Lilienstern 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 111.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 111.00
<b>G. Full Name, Mailing Address and ZIP Code</b> Dennis L. Lutes 4400 Thanksgiving Tower Dallas, Texas 75201  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 92.00	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 92.00
<b>SUBTOTAL of Receipts This Page (optional)</b>			801.00
<b>TOTAL This Period (last page this line number only)</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

LINE NUMBER  
(Use separate schedule(s) for each  
category of the Detailed  
Summary Page)

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Name of Committee (in Full)  
**ANDREWS, KURT LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b>  <b>Barry M. Miller</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b>  <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>6/3/82</b>	<b>Amount of Each Receipt this Period</b>  <b>\$111.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 111.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b>  <b>William T. Miller</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b>  <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b>  <b>142.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 142.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b>  <b>Clinton F. Morse</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b>  <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b>  <b>147.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 147.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b>  <b>Clinton S. Morse</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b>  <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b>  <b>92.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 92.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b>  <b>P. Dexter Peacock</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b>  <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b>  <b>147.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 147.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b>  <b>Larry B. Phillips, III</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b>  <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b>  <b>123.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 123.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b>  <b>Hugh M. Ray</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b>  <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b>  <b>129.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 129.00</b>	
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>891.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 6 of 8 for  
**LINE NUMBER**  
 (Use separate schedule for each  
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 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Robert F. Ritchie 4400 Thanksgiving Tower Dallas, Texas 75201	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt this Period</b> \$ 36.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$36.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> Michael Q. Rosenwasser 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 142.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$142.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> Thomas F. Ryan, Jr. 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 164.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>		
	<b>Aggregate Year-to-Date—\$164.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> Thomas L. Schubert 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 111.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$111.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Joel I. Shannon 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 111.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$111.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> Laurence Sikes 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 149.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$149.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> Richard S. Simms 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 6/3/82	<b>Amount of Each Receipt This Period</b> 52.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney		
	<b>Aggregate Year-to-Date—\$52.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$765.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

**LINE NUMBER**  
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>W. M. Streetman</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>6/3/82</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 36.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 36.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>William H. Tenison</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b> <b>107.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 107.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Denton N. Thomas</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b> <b>52.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 52.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Marcus L. Thompson</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b> <b>129.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 129.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Hall E. Timanus</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b> <b>86.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 86.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Timothy Unger</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b> <b>52.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 52.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Bass C. Wallace</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b> <b>144.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 144.00</b>	
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>606.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

35040534036

# SCHEDULE A

# ITEMIZED RECEIPTS

LINE NUMBER  
(Use separate schedule(s) for each  
category of the Detailed  
Summary Page)

Any information copied from such Reports or 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.

Name of Committee (in Full)  
**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Robert S. Weatherall</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>6/3/82</b>	<b>Amount of Each Receipt this Period</b>  <b>\$119.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date—\$ 119.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Milton H. West, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b>  <b>178.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date—\$ 178.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Donald E. Woodard</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b>	<b>Date (month, day, year)</b>  <b>6/3/82</b>	<b>Amount of Each Receipt This Period</b>  <b>127.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date—\$ 127.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>   <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date—\$</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>   <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date—\$</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>   <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date—\$</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>   <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date—\$</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>424.00</b>
<b>TOTAL This Period (last page this line number only)</b>			<b>\$6,000.00</b>

85040554037

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
**For a Political Committee Other Than an Authorized Committee**

(Summary Page)

RECEIVED THE FEC  
05 JUL 15 4 03 PM '85  
FEDERAL ELECTION AREA

ALIGN AREA

1. Name of Committee (In Full)  
**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

Address (Number and Street)  
**4200 TEXAS COMMERCE TOWER**

City, State and ZIP Code  
**HOUSTON, TEXAS 77002**

☐ Check here if address is different than previously reported.

2. FEC Identification Number  
**C00089540**

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☒ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?  
☒ YES ☐ NO

**SUMMARY**

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>July 1, 1982</u> through <u>September 30, 1982</u>		
6. (a) Cash on hand January 1, 19 <u>82</u>		\$ 5,900.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 3,100.00	
(c) Total Receipts (from Line 18)	\$ 2,000.00	\$ 8,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 5,100.00	\$ 13,900.00
7. Total Disbursements (from Line 28)	\$ 4,500.00	\$ 13,300.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 600.00	\$ 600.00
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ - 0 -	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ - 0 -	

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

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

Jerry V. Kyle  
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

May 23, 1985  
Date

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 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)



# SCHEDULE A

# ITEMIZED RECEIPTS

LINE NUMBER  
(Use separate schedule(s) for each  
category of the Detailed  
Summary Page)

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Name of Committee (in Full)  
**ANDREWS, KURT LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b>  <b>Douglas Bech</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 190.00</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt this Period</b>  <b>\$ 48.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b>  <b>Terry Bell</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 70.00</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>18.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b>  <b>Lawrence Bellatti</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 110.00</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>28.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b>  <b>Robert L. Bradley</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 129.00</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>33.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b>  <b>Richard F. Burns</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 48.00</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>12.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>  <b>Michael F. Butler</b> <b>1747 Pennsylvania Avenue</b> <b>Washington, D. C. 20006</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 186.00</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>47.00</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>  <b>John T. Cabaniss</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 197.00</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>50.00</b>
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>236.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

85040554039



**SCHEDULE A**

**ITEMIZED RECEIPTS**

**LINE NUMBER**  
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURT LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>James V. Carroll, III</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D. C. 20006</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 50.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 199.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Douglas E. Clarke</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>18.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 70.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Sam Cruse, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>42.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 165.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Frank B. Davis</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>49.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 193.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>James W. Dilworth</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>52.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 204.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Seaborn Eastland, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>29.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 115.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Alfred H. Ebert, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>56.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 220.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>296.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040534040

# SCHEDULE A

# ITEMIZED RECEIPTS

Page 1 of 1 for  
LINE NUMBER  
(Use separate schedule(s) for each  
category at the Detailed  
Summary Page)

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Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE

<b>A. Full Name, Mailing Address and ZIP Code</b> Byron F. Egan 4400 Thanksgiving Tower Dallas, Texas 75201	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt this Period</b> \$ 49.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 193.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> David G. Elkins 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 49.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 193.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> L. E. Frazier, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 50.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 197.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> Robert G. Hardy 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 38.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 149.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Bruce M. Harrington 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 30.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 120.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> Paul E. Harris 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 56.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 220.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> Thomas L. Healey 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 50.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 199.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>322.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

35040554041

**SCHEDULE A**

**ITEMIZED RECEIPTS**

LINE NUMBER \_\_\_\_\_  
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Taylor M. Hicks, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 38.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 149.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Edith H. Jones</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>18.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 70.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Fred M. Knapp, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>50.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 197.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Jerry V. Kyle</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>49.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 193.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Lee R. Larkin</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>49.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 193.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>O. Clayton Lilienstern</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>38.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 149.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Dennis L. Lutes</b> <b>4400 Thanksgiving Tower</b> <b>Dallas, Texas 75201</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b> <b>31.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 123.00</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>273.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

8504043



# SCHEDULE A

# ITEMIZED RECEIPTS

LINE NUMBER  
(Use separate schedule(s) for each  
category of the Detailed  
Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Barry M. Miller 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt this Period</b> \$ 38.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 149.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> William T. Miller 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 48.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 190.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Clinton F. Morse 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 50.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 197.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> P. Dexter Peacock 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 50.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 197.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Larry B. Phillips, III 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 42.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 165.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Hugh M. Ray 4200 Texas Commerce Tower Houston, Texas 77002		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 44.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 173.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> Robert F. Ritchie 4400 Thanksgiving Tower Dallas, Texas 75201		<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt This Period</b> 12.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 48.00	
<b>SUBTOTAL of Receipts This Page (optional)</b>				284.00
<b>TOTAL This Period (last page this line number only)</b>				

85040554043



**SCHEDULE A**

**ITEMIZED RECEIPTS**

LINE NUMBER  
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Michael Q. Rosenwasser</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt this Period</b>  <b>\$ 48.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 190.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Thomas F. Ryan, Jr.</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>56.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 220.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Thomas L. Schubert</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>38.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 149.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Joel I. Shannon</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>38.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 149.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Laurence Sikes</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>51.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 200.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Richard S. Simms</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>18.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 70.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>William H. Tenison, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b>  <b>9/17/82</b>	<b>Amount of Each Receipt This Period</b>  <b>37.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 144.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>286.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

8504054044

# SCHEDULE A

# ITEMIZED RECEIPTS

LINE NUMBER  
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE

<b>A. Full Name, Mailing Address and ZIP Code</b>  Hall E. Timanus 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self-employed  Occupation Attorney  Aggregate Year-to-Date-\$ 115.00	Date (month, day, year)  9/17/82	Amount of Each Receipt this Period  \$ 29.00
<b>B. Full Name, Mailing Address and ZIP Code</b>  Denton N. Thomas 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self-employed  Occupation Attorney  Aggregate Year-to-Date-\$ 70.00	Date (month, day, year)  9/17/82	Amount of Each Receipt This Period  18.00
<b>C. Full Name, Mailing Address and ZIP Code</b>  Marcus L. Thompson 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self-employed  Occupation Attorney  Aggregate Year-to-Date-\$ 173.00	Date (month, day, year)  9/17/82	Amount of Each Receipt This Period  44.00
<b>D. Full Name, Mailing Address and ZIP Code</b>  Timothy Unger 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self-employed  Occupation Attorney  Aggregate Year-to-Date-\$ 70.00	Date (month, day, year)  9/17/82	Amount of Each Receipt This Period  18.00
<b>E. Full Name, Mailing Address and ZIP Code</b>  Bass C. Wallace 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self-employed  Occupation Attorney  Aggregate Year-to-Date-\$ 193.00	Date (month, day, year)  9/17/82	Amount of Each Receipt This Period  49.00
<b>F. Full Name, Mailing Address and ZIP Code</b>  Robert S. Weatherall 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self-employed  Occupation Attorney  Aggregate Year-to-Date-\$ 160.00	Date (month, day, year)  9/17/82	Amount of Each Receipt This Period  41.00
<b>G. Full Name, Mailing Address and ZIP Code</b>  Milton H. West, Jr. 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self-employed  Occupation Attorney  Aggregate Year-to-Date-\$ 239.00	Date (month, day, year)  9/17/82	Amount of Each Receipt This Period  61.00
<b>SUBTOTAL of Receipts This Page (optional)</b> . . . . .			260.00
<b>TOTAL This Period (last page this line number only)</b> . . . . .			

85040554045

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 2 of 2 for  
**LINE NUMBER**  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Donald E. Woodard 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 9/17/82	<b>Amount of Each Receipt this Period</b> \$ 43.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 170.00		
<b>B. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			43.00
<b>TOTAL This Period (last page this line number only)</b>			\$2,000.00

35040554046



**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

RECEIVED BY THE FEC

(Summary Page)

05 JUL 15 4 0:12  
ALIGN AREA

ALIGN AREA

**1. Name of Committee (in Full)**

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

**Address (Number and Street)**

**4200 TEXAS COMMERCE TOWER**

**City, State and ZIP Code**

**HOUSTON, TEXAS 77002**

☐ Check here if address is different than previously reported.

**2. FEC Identification Number**

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

**4. TYPE OF REPORT (Check appropriate boxes)**

- (a) ☐ April 15 Quarterly Report ☒ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?

☒ YES ☐ NO

**SUMMARY**

5. Covering Period August 1, 1983 through October 15, 1983

6. (a) Cash on hand January 1, 19 83

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D)

**COLUMN A  
This Period**

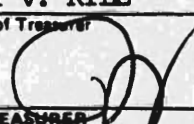
**COLUMN B  
Calendar Year-to-Date**

	\$ 139.30
\$ 2,639.30	
\$ 5,000.00	\$ 15,000.00
\$ 7,639.30	\$ 15,139.30
\$ 3,100.00	\$ 10,600.00
\$ 4,539.30	\$ 4,539.30
\$ - - - -	
\$ - - - -	

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

**JERRY V. KYLE**

Type or Print Name of Treasurer



SIGNATURE OF TREASURER

May 23, 1985  
Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4088

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 3 and FEC FORM 3e are obsolete and should no longer be used.

FEC FORM 3X (3/80)

85040554047



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 8  
 LINE NUMBER  
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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Douglas Y. Bech 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt this Period</b> \$118.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 354.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> R. Terry Bell 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 56.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 169.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> Lawrence L. Bellatti 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 67.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 201.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> Robert L. Bradley 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Self-employed	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 60.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 179.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Richard F. Burns 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 28.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 84.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> Michael F. Butler 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 118.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 354.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> John T. Cabaniss 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 123.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$ 368.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$570.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040554048

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 1 for  
**LINE NUMBER**  
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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> James V. Carroll, III 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt this Period</b> \$125.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 375.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> Douglas E. Clarke 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 56.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 169.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> Bruce R. Coulombe 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 43.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 129.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> Sam W. Cruse, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 110.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 330.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Frank B. Davis 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 125.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 375.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> James W. Dilworth 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 140.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 419.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> Seaborn Eastland, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 54.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 162.00</b>		
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$653.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

35040554049

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 3 of 8 for  
**LINE NUMBER**  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Alfred H. Ebert, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 419.00</b>	<b>Date (month, day, year)</b>  <b>10/13/83</b>	<b>Amount of Each Receipt this Period</b>  <b>\$140.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Byron F. Egan</b> <b>4400 Thanksgiving Tower</b> <b>Dallas, Texas 75201</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 360.00</b>	<b>Date (month, day, year)</b>  <b>10/13/83</b>	<b>Amount of Each Receipt This Period</b>  <b>120.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>David G. Elkins</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 360.00</b>	<b>Date (month, day, year)</b>  <b>10/13/83</b>	<b>Amount of Each Receipt This Period</b>  <b>120.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>L. E. Frazier, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 368.00</b>	<b>Date (month, day, year)</b>  <b>10/13/83</b>	<b>Amount of Each Receipt This Period</b>  <b>123.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Robert G. Hardy</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 300.00</b>	<b>Date (month, day, year)</b>  <b>10/13/83</b>	<b>Amount of Each Receipt This Period</b>  <b>100.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Bruce M. Harrington</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 186.00</b>	<b>Date (month, day, year)</b>  <b>10/13/83</b>	<b>Amount of Each Receipt This Period</b>  <b>62.00</b>
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Paul E. Harris</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 418.00</b>	<b>Date (month, day, year)</b>  <b>10/13/83</b>	<b>Amount of Each Receipt This Period</b>  <b>139.00</b>
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$804.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040554050



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 1  
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 (Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Thomas L. Healey 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt this Period</b> \$125.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 375.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> Taylor M. Hicks, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 100.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 300.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> Edith H. Jones 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 56.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 169.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> Fred M. Knapp, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 123.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 368.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Jerry V. Kyle 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 118.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 354.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> Lee R. Larkin 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 120.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 360.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> O. Clayton Lilienstern 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 100.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 300.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$742.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

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LINE NUMBER  
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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Dennis L. Lutes 4400 Thanksgiving Tower Dallas, Texas 75201  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 243.00	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt this Period</b> \$ 81.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Barry R. Miller 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 300.00	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 100.00
<b>C. Full Name, Mailing Address and ZIP Code</b> William T. Miller 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 354.00	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 118.00
<b>D. Full Name, Mailing Address and ZIP Code</b> Clinton F. Morse 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 368.00	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 123.00
<b>E. Full Name, Mailing Address and ZIP Code</b> P. Dexter Peacock 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 368.00	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 123.00
<b>F. Full Name, Mailing Address and ZIP Code</b> Thomas J. Perich 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 129.00	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 43.00
<b>G. Full Name, Mailing Address and ZIP Code</b> Larry B. Phillips, III 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney Aggregate Year-to-Date-\$ 315.00	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 105.00
<b>SUBTOTAL of Receipts This Page (optional)</b>			\$693.00
<b>TOTAL This Period (last page this line number only)</b>			

35040554052

## SCHEDULE A

## ITEMIZED RECEIPTS

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 LINE NUMBER \_\_\_\_\_  
 (Use separate schedules for each  
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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Hugh M. Ray 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt this Period</b> \$118.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 354.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> Robert F. Ritchie 4400 Thanksgiving Tower Dallas, Texas 75201	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 28.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 84.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> Michael Q. Rosenwasser 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 118.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 354.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Thomas F. Ryan, Jr. 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 139.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 418.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Thomas L. Schubert 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 100.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 300.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> Joel I. Shannon 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 100.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 300.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> Laurence D. Sikes, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 125.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date--\$</b> 375.00		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$728.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040554053

**SCHEDULE A**

**ITEMIZED RECEIPTS**

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 (Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Richard S. Simms 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt this Period</b> \$ 56.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 169.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> Michael Stuart 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 43.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 129.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> William H. Tenison, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 79.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 237.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> Denton N. Thomas 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 56.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 169.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> Marcus L. Thompson 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 118.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 354.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> Hall E. Timanus 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 54.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 162.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> Timothy J. Unger 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 10/13/83	<b>Amount of Each Receipt This Period</b> 56.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 169.00</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$462.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040554054



**SCHEDULE A**

**ITEMIZED RECEIPTS**

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**LINE NUMBER** \_\_\_\_\_  
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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Bass C. Wallace</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 360.00</b>	<b>Date (month, day, year)</b>  <b>10/13/83</b>	<b>Amount of Each Receipt this Period</b>  <b>\$120.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Robert S. Weatherall</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 285.00</b>	<b>Date (month, day, year)</b>  <b>10/13/83</b>	<b>Amount of Each Receipt This Period</b>  <b>95.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Milton H. West, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 399.00</b>	<b>Date (month, day, year)</b>  <b>10/13/83</b>	<b>Amount of Each Receipt This Period</b>  <b>133.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b>    Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>  <b>Aggregate Year-to-Date—\$</b>	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>E. Full Name, Mailing Address and ZIP Code</b>    Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>  <b>Aggregate Year-to-Date—\$</b>	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>F. Full Name, Mailing Address and ZIP Code</b>    Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>  <b>Aggregate Year-to-Date—\$</b>	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>G. Full Name, Mailing Address and ZIP Code</b>    Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>  <b>Aggregate Year-to-Date—\$</b>	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$ 348.00</b>
<b>TOTAL This Period (last page this line number only)</b>			<b>\$5,000.00</b>

85040554053



REPORT OF RECEIPTS AND DISBURSEMENTS  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

85 JUN 15 89:12  
ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

ANDREWS, KURTH LAWYERS FOR  
AMERICA COMMITTEE

Address (Number and Street)

4200 TEXAS COMMERCE TOWER

City, State and ZIP Code

HOUSTON, TEXAS 77002

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00089540

3. ☐ This committee qualified as a multicandidate committee during  
this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

- (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☒ Thirtieth day report following the General Election  
on Nov. 8, 1983 in the State of Texas  
☐ Termination Report

(b) Is this Report an Amendment?

☒ YES ☐ NO

SUMMARY

5. Covering Period October 16, 1983 through December 3, 1983

6. (a) Cash on hand January 1, 19 83

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D)

COLUMN A  
This Period

COLUMN B  
Calendar Year-to-Date

\$ 139.30

\$ 4,539.30

\$ 5,000.00

\$ 20,000.00

\$ 9,539.30

\$ 20,139.30

\$ 5,200.00

\$ 15,800.00

\$ 4,339.30

\$ 4,339.30

\$ - - - - -

\$ - - - - -

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

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4088

JERRY V. KYLE

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

May 23, 1985  
Date

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 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 8 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Douglas Y. Bech 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney  Aggregate Year-to-Date-\$ 472.00	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt this Period</b> \$118.00
<b>B. Full Name, Mailing Address and ZIP Code</b> R. Terry Bell 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney  Aggregate Year-to-Date-\$ 225.00	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 56.00
<b>C. Full Name, Mailing Address and ZIP Code</b> Lawrence L. Bellatti 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney  Aggregate Year-to-Date-\$ 268.00	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 67.00
<b>D. Full Name, Mailing Address and ZIP Code</b> Robert L. Bradley 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney  Aggregate Year-to-Date-\$ 239.00	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 60.00
<b>E. Full Name, Mailing Address and ZIP Code</b> Michael F. Butler 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney  Aggregate Year-to-Date-\$ 472.00	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 118.00
<b>F. Full Name, Mailing Address and ZIP Code</b> Richard F. Burns 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney  Aggregate Year-to-Date-\$ 112.00	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 28.00
<b>G. Full Name, Mailing Address and ZIP Code</b> John T. Cabaniss 4200 Texas Commerce Tower Houston, Texas 77002  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney  Aggregate Year-to-Date-\$ 491.00	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 123.00
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$570.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040554057

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 2 of 8 for  
**LINE NUMBER**  
 (Use separate schedules for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>James V. Carroll, III</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 500.00</b>	<b>Date (month, day, year)</b>  <b>11/30/83</b>	<b>Amount of Each Receipt this Period</b>  <b>\$125.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Douglas E. Clarke</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 225.00</b>	<b>Date (month, day, year)</b>  <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b>  <b>56.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Bruce R. Coulombe</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 172.00</b>	<b>Date (month, day, year)</b>  <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b>  <b>43.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Sam W. Cruse, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 440.00</b>	<b>Date (month, day, year)</b>  <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b>  <b>110.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Frank B. Davis</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 500.00</b>	<b>Date (month, day, year)</b>  <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b>  <b>125.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>James W. Dilworth</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 559.00</b>	<b>Date (month, day, year)</b>  <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b>  <b>140.00</b>
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Seaborn Eastland, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>  <b>Aggregate Year-to-Date—\$ 216.00</b>	<b>Date (month, day, year)</b>  <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b>  <b>54.00</b>
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$653.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

85040534058



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 3 of 8 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Alfred H. Ebert, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt this Period</b> <b>\$140.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
		<b>Aggregate Year-to-Date—\$ 559.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Byron F. Egan</b> <b>4400 Thanksgiving Tower</b> <b>Dallas, Texas 75201</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>120.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
		<b>Aggregate Year-to-Date—\$ 480.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>David G. Elkins</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>120.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
		<b>Aggregate Year-to-Date—\$ 480.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>L. E. Frazier, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>123.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
		<b>Aggregate Year-to-Date—\$ 491.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Robert G. Hardy</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>100.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
		<b>Aggregate Year-to-Date—\$ 400.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Bruce M. Harrington</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>62.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
		<b>Aggregate Year-to-Date—\$ 248.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Paul E. Harris</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>139.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>		
		<b>Aggregate Year-to-Date—\$ 557.00</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$804.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040554059



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 4 of 8 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule for each  
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 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Thomas L. Healey 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt this Period</b> \$125.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 500.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Taylor M. Hicks, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 100.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 400.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Edith H. Jones 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 56.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 225.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Fred M. Knapp, Jr. 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 123.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 491.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Jerry V. Kyle 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 118.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 472.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Lee R. Larkin 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 120.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 480.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> O. Clayton Lilienstern 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 11/30/83	<b>Amount of Each Receipt This Period</b> 100.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 400.00	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$742.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040554060

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 5 of 8 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule(s) for each  
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Name of Committee (in Full) <b>ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE</b>			
A. Full Name, Mailing Address and ZIP Code <b>Dennis L. Lutes 4400 Thanksgiving Tower Dallas, Texas 75201</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>11/30/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt this Period <b>\$ 81.00</b>
		Aggregate Year-to-Date-\$ <b>324.00</b>	
B. Full Name, Mailing Address and ZIP Code <b>Barry R. Miller 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>11/30/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>100.00</b>
		Aggregate Year-to-Date-\$ <b>400.00</b>	
C. Full Name, Mailing Address and ZIP Code <b>William T. Miller 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>11/30/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>118.00</b>
		Aggregate Year-to-Date-\$ <b>472.00</b>	
D. Full Name, Mailing Address and ZIP Code <b>Clinton F. Morse 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>11/30/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>123.00</b>
		Aggregate Year-to-Date-\$ <b>491.00</b>	
E. Full Name, Mailing Address and ZIP Code <b>P. Dexter Peacock 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>11/30/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>123.00</b>
		Aggregate Year-to-Date-\$ <b>491.00</b>	
F. Full Name, Mailing Address and ZIP Code <b>Thomas J. Perich 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>11/30/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>43.00</b>
		Aggregate Year-to-Date-\$ <b>172.00</b>	
G. Full Name, Mailing Address and ZIP Code <b>Larry B. Phillips, III 4200 Texas Commerce Tower Houston, Texas 77002</b>		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>11/30/83</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>	Amount of Each Receipt This Period <b>105.00</b>
		Aggregate Year-to-Date-\$ <b>420.00</b>	
SUBTOTAL of Receipts This Page (optional) . . . . .			<b>\$693.00</b>
TOTAL This Period (last page this line number only) . . . . .			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 6 of 8 for  
**LINE NUMBER**  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)  
**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Hugh M. Ray</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt this Period</b> <b>\$118.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 472.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Robert F. Ritchie</b> <b>4400 Thanksgiving Tower</b> <b>Dallas, Texas 75201</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>28.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 112.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Michael Q. Rosenwasser</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>118.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 472.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Thomas F. Ryan, Jr.</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>139.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 557.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Thomas L. Schubert</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>100.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 400.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Joel I. Shannon</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>100.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 400.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Laurence D. Sikes, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b> <b>125.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 500.00</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$728.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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85040554063



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 8 of 8 for  
 LINE NUMBER \_\_\_\_\_  
 (Use separate schedule(s) for each  
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 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Bass C. Wallace</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt this Period</b>  <b>\$120.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 480.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Robert S. Weatherall</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b>  <b>95.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 380.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Milton H. West, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b> <b>11/30/83</b>	<b>Amount of Each Receipt This Period</b>  <b>133.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 532.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b>    	<b>Name of Employer</b>   <b>Occupation</b>  	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b>    	<b>Name of Employer</b>   <b>Occupation</b>  	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b>    	<b>Name of Employer</b>   <b>Occupation</b>  	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b>    	<b>Name of Employer</b>   <b>Occupation</b>  	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt This Period</b>   
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b>		
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$ 348.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			<b>\$5,000.00</b>

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REPORT OF RECEIPTS AND DISBURSEMENTS  
For a Political Committee Other Than an Authorized Committee

THE FEC

(Summary Page)

05 JUL 15 1985

ALIGN AREA

1. Name of Committee (In Full)  
**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

Address (Number and Street)  
**4200 TEXAS COMMERCE TOWER**

City, State and ZIP Code  
**HOUSTON, TEXAS 77002**

☐ Check here if address is different than previously reported.

2. FEC Identification Number  
**C0089540**

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☒ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?  
☒ YES ☐ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>Jan. 1, 1984</u> through <u>March 31, 1984</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>		\$ 4,339.30
(b) Cash on Hand at Beginning of Reporting Period	\$ 4,339.30	
(c) Total Receipts (from Line 18)	\$ 10,000.00	\$ 10,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 14,339.30	\$ 14,339.30
7. Total Disbursements (from Line 28)	\$ 5,800.00	\$ 5,800.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 8,539.30	\$ 8,539.30
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

Jerry V. Kyle  
Type or Print Name of Treasurer

[Signature]  
SIGNATURE OF TREASURER

May 23, 1985  
Date

For further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-623-4068

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 3 and FEC FORM 3e are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 9 for  
**LINE NUMBER**  
 (Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Douglas Y. Bech 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt this Period</b> \$221.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 221.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> R. Terry Bell 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 121.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 121.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Lawrence L. Bellatti 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 132.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 132.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Everett W. Benton 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 89.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 89.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Robert L. Bradley 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 74.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 74.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Richard F. Burns 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 53.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 53.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> Michael F. Butler 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006	<b>Name of Employer</b> Self-employed	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 221.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date—\$</b> 221.00	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$911.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 2 of 3 for  
**LINE NUMBER** \_\_\_\_\_  
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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>John T. Cabaniss</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> Aggregate Year-to-Date-\$ <b>232.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt this Period</b>  <b>\$232.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>James V. Carroll, III</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> Aggregate Year-to-Date-\$ <b>232.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>232.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Douglas E. Clarke</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> Aggregate Year-to-Date-\$ <b>121.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>121.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Bruce R. Coulombe</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> Aggregate Year-to-Date-\$ <b>105.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>105.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Sam W. Cruse, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> Aggregate Year-to-Date-\$ <b>211.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>211.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Frank B. Davis</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> Aggregate Year-to-Date-\$ <b>232.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>232.00</b>
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>James W. Dilworth</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> Aggregate Year-to-Date-\$ <b>257.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>257.00</b>
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$1,390.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 3 of 9 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule(s) for each  
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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Seaborn Eastland, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 67.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt this Period</b>  <b>\$ 67.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Alfred H. Ebert, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 257.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>257.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Byron F. Egan</b> <b>4400 Thanksgiving Tower</b> <b>Dallas, Texas 75201</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 226.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>226.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>David G. Elkins</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 226.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>226.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>L. E. Frazier, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 211.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>211.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>David Graham</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 90.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>90.00</b>
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Patricia S. Greek</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 90.00</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>90.00</b>
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$1,167.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

3504054068

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 4 of 9  
**LINE NUMBER**  
 (Use separate schedule for each category of the Detailed Summary Page)

Any information copied from such Reports or 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.				
Name of Committee (in Full) <b>ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE</b>				
<b>A. Full Name, Mailing Address and ZIP Code</b> Robert G. Hardy 1747 Pennsylvania Avenue, N.W. Washington, D.C. 20006		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>3/15/84</b>	Amount of Each Receipt this Period <b>\$189.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>		
Aggregate Year-to-Date-\$ <b>189.00</b>				
<b>B. Full Name, Mailing Address and ZIP Code</b> Paul E. Harris 4200 Texas Commerce Tower Houston, Texas 77002		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>3/15/84</b>	Amount of Each Receipt This Period <b>257.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>		
Aggregate Year-to-Date-\$ <b>257.00</b>				
<b>C. Full Name, Mailing Address and ZIP Code</b> Thomas L. Healey 4200 Texas Commerce Tower Houston, Texas 77002		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>3/15/84</b>	Amount of Each Receipt This Period <b>232.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>		
Aggregate Year-to-Date-\$ <b>232.00</b>				
<b>D. Full Name, Mailing Address and ZIP Code</b> Taylor M. Hicks, Jr. 4200 Texas Commerce Tower Houston, Texas 77002		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>3/15/84</b>	Amount of Each Receipt This Period <b>189.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>		
Aggregate Year-to-Date-\$ <b>189.00</b>				
<b>E. Full Name, Mailing Address and ZIP Code</b> Edith H. Jones 4200 Texas Commerce Tower Houston, Texas 77002		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>3/15/84</b>	Amount of Each Receipt This Period <b>121.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>		
Aggregate Year-to-Date-\$ <b>121.00</b>				
<b>F. Full Name, Mailing Address and ZIP Code</b> Fred M. Knapp, Jr. 4200 Texas Commerce Tower Houston, Texas 77002		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>3/15/84</b>	Amount of Each Receipt This Period <b>232.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>		
Aggregate Year-to-Date-\$ <b>232.00</b>				
<b>G. Full Name, Mailing Address and ZIP Code</b> Jerry V. Kyle 4200 Texas Commerce Tower Houston, Texas 77002		Name of Employer <b>Self-employed</b>	Date (month, day, year) <b>3/15/84</b>	Amount of Each Receipt This Period <b>226.00</b>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <b>Attorney</b>		
Aggregate Year-to-Date-\$ <b>226.00</b>				
<b>SUBTOTAL of Receipts This Page (optional)</b>				<b>\$1,446.00</b>
<b>TOTAL This Period (last page this line number only)</b>				

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 5 of 9  
 LINE NUMBER \_\_\_\_\_  
 (Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports or 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.

Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>B. John Lange, III</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt this Period</b>  <b>\$ 90.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 90.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Lee R. Larkin</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>221.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 221.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>O. Clayton Lillienstern</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>189.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 189.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Dennis L. Lutes</b> <b>4400 Thanksgiving Tower</b> <b>Dallas, Texas 75201</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>158.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 158.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Margaret E. Martin</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>90.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 90.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Barry R. Miller</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>189.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 189.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>William T. Miller</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>221.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 221.00</b>		
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$1,158.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

85040534070



**SCHEDULE A**

**ITEMIZED RECEIPTS**

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**LINE NUMBER**  
 (Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> Clinton F. Morse 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt this Period</b> \$226.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 226.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> James E. Myers 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 90.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 90.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> P. Dexter Peacock 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 232.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 232.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Thomas L. Perich 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 105.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 105.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Larry B. Phillips, III 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 189.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 189.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> Hugh M. Ray 4200 Texas Commerce Tower Houston, Texas 77002	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 221.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 221.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> Robert F. Ritchie 4400 Thanksgiving Tower Dallas, Texas 75201	<b>Name of Employer</b> Self-employed  <b>Occupation</b> Attorney	<b>Date (month, day, year)</b> 3/15/84	<b>Amount of Each Receipt This Period</b> 53.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$</b> 53.00		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$1,116.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040554071



**SCHEDULE A**

**ITEMIZED RECEIPTS**

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**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedules for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Michael Q. Rosenwasser</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 221.00</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt this Period</b>  <b>\$221.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Thomas F. Ryan, Jr.</b> <b>1747 Pennsylvania Avenue, N.W.</b> <b>Washington, D.C. 20006</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 257.00</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>257.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Thomas L. Schubert</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 189.00</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>189.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Joel I. Shannon</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 189.00</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>189.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Laurence D. Sikes, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 232.00</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>232.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Richard S. Simms</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b> <b>Aggregate Year-to-Date—\$ 121.00</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>121.00</b>
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>John S. Slavich</b> <b>4400 Thanksgiving Tower</b> <b>Dallas, Texas 75201</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date—\$ 89.00</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>89.00</b>
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$1,298.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

85040554072

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 8 of 9 for  
**LINE NUMBER** \_\_\_\_\_  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Michael Stuart</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt this Period</b>  <b>\$105.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 105.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>William H. Tenison, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>132.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 132.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Hall E. Timanus</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>67.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 67.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Denton N. Thomas</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>121.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 121.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Marcus L. Thompson</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>221.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 221.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Timothy J. Unger</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>121.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 121.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Bass C. Wallace</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>  <b>Occupation</b> <b>Attorney</b>	<b>Date (month, day, year)</b>  <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b>  <b>221.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date—\$ 221.00</b>		
<b>SUBTOTAL of Receipts This Page (optional) . . . . .</b>			<b>\$988.00</b>
<b>TOTAL This Period (last page this line number only) . . . . .</b>			

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 9 of 9 for  
**LINE NUMBER**  
 (Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)

**ANDREWS, KURTH LAWYERS FOR AMERICA COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Robert S. Weatherall</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt this Period</b> <b>\$163.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 163.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Milton H. West, Jr.</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b> <b>183.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 183.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Bradley Westmoreland</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b> <b>90.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> <b>Attorney</b>	<b>Aggregate Year-to-Date—\$ 90.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>John R. Williford</b> <b>4200 Texas Commerce Tower</b> <b>Houston, Texas 77002</b>	<b>Name of Employer</b> <b>Self-employed</b>	<b>Date (month, day, year)</b> <b>3/15/84</b>	<b>Amount of Each Receipt This Period</b> <b>90.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$ 90.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$ 526.00</b>
<b>TOTAL This Period (last page this line number only)</b>			<b>\$10,000.00</b>

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