



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2901

DATE FILMED \_\_\_\_\_ CAMERA NO. 2

CAMERAMAN AS

0040312248



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

NOTE: Two related cases, MUR 2897 and MUR 2898, were closed earlier and already appear on the public record.

99040312249

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 8 March 1989

ANALYST: Anthony Raymond

I. COMMITTEE: Policy Innovation Political Action Committee  
(C00222810)  
Susan Armey, Treasurer  
P.O. Box 426  
Lewisville, TX 75067

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)(ii)  
11 CFR 104.5(c)(1)(ii)

III. BACKGROUND:

Failure to File the 1988 12 Day Pre-General Report by  
Election Day

The Policy Innovation Political Action Committee (the  
"Committee") failed to file the 1988 12 Day Pre-General  
Report by Election Day, November 8, 1988. The Committee was  
notified on October 3, 1988, that a 12 Day Pre-General  
Report was due on October 27, 1988, if contributions and  
expenditures were made in connection with the general  
election during the period October 1, 1988 to October 19,  
1988 (Attachment 2).

On December 19, 1988, the Committee filed the 1988 30  
Day Post-General Election Report (Attachment 3). The  
beginning coverage date of the report, October 20, 1988,  
indicated that the 1988 12 Day Pre-Election filing had not  
been submitted.

A Non-Filer Notice for the 1988 12 Day Pre-General  
Election Report was sent to the Committee on January 25,  
1989 (Attachment 4).

On February 14, 1989, the Committee filed the 1988 12  
Day Pre-General Report (Attachment 5). The report disclosed  
twenty-two contributions to federal candidates totalling  
\$18,500 (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

90040812250

FEDERAL ELECTION COMMISSION  
1987-1988  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 2MAR89

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
POLICY INNOVATION POLITICAL ACTION COMMITTEE						ID #C00222810 NON-PARTY QUALIFIED
CONNECTED ORGANIZATION: NONE						
1988 STATEMENT OF ORGANIZATION				16FEB88	2	88FEC/509/1103
REQUEST FOR ADDITIONAL INFORMATION				2MAR88	1	88FEC/512/1006
STATEMENT OF ORGANIZATION - AMENDMENT				11MAR88	2	88FEC/512/4986
MISCELLANEOUS REPORT TO FEC				7OCT88	2	88FEC/550/1020
APRIL QUARTERLY	15,000	690		1JAN88 -31MAR88	7	88FEC/520/0534
JULY QUARTERLY	4,614	9,074		1APR88 -30JUN88	11	88FEC/538/4932
JULY QUARTERLY - AMENDMENT	6,214	9,073		1APR88 -30JUN88	3	88FEC/557/4643
JULY QUARTERLY - AMENDMENT	-	-		1APR88 -30JUN88	3	89FEC/585/5302
REQUEST FOR ADDITIONAL INFORMATION				1APR88 -30JUN88	1	88FEC/568/2756
REQUEST FOR ADDITIONAL INFORMATION 2ND				1APR88 -30JUN88	2	89FEC/575/4813
OCTOBER QUARTERLY	47,106	25,990		1JUL88 -30SEP88	22	88FEC/559/2744
OCTOBER QUARTERLY - AMENDMENT	-	-		1JUL88 -30SEP88	2	88FEC/575/3601
REQUEST FOR ADDITIONAL INFORMATION				1JUL88 -30SEP88	2	88FEC/568/2790
PRE-GENERAL	13,820	26,020		1OCT88 -19OCT88	11	89FEC/585/2216
NOTICE OF FAILURE TO FILE				1OCT88 -19OCT88	1	89FEC/579/3879
POST-GENERAL	10,589	18,675		20OCT88 -28NOV88	7	88FEC/575/0037
POST-GENERAL - AMENDMENT	10,589	18,675		20OCT88 -28NOV88	3	89FEC/585/0499
1 ST LETTER INFORMATIONAL NOTICE				20OCT88 -28NOV88	1	89FEC/580/1916
YEAR-END	0	1,660		29NOV88 -31DEC88	3	89FEC/585/0503
TOTAL	92,729	0	82,117		86	TOTAL PAGES

All reports have been reviewed

Cash-on-hand as of 12/31/88: \$10,611

Debts and obligations owed to the committee as of 12/31/88: \$-0-

Debts and obligations owed by the committee as of 12/31/88: \$-0-



# REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 3, 1988

### I. ALL MONTHLY FILERS

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

### II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19\*\*\*

Report	Reporting period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

### III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19\*\*\*

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Post-General	10/01/88**-11/28/88	12/08/88	12/08/88

### WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file the pre-general election report. All Party committees and PACs, regardless of financial activity, must file the post-general election report.

### WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

\*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

\*\*Or from the date of registration, or the close of books of the last report filed, whichever is later.

\*\*\*Committees that made general election contributions or expenditures prior to October 1 which have not been previously reported must also follow the Chart II reporting requirements.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530

(over)

202-376-3120

**REPORTING FORMS**

Party committees and PACs use Form 3X (enclosed).

**WHERE TO FILE**

Consult the instructions on the back of the Form 3X Summary Page.  
Note State filing requirements also.

**LABEL**

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

**LAST-MINUTE INDEPENDENT EXPENDITURES**

Any PAC which makes any independent expenditures aggregating \$1,000 or more during the period beginning October 20 and ending November 6 must report them within 24 hours. Call the FEC for more information.

**COMPLIANCE**

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

9 0 0 4 0 3 1 3 2 5 3

# REPORT OF RECEIPTS AND DISBURSEMENTS

For All Authorized Committees  
(Primary/Type)

00 DEC 19 09:00:25

1. NAME OF COMMITTEE (Print) <b>Policy Innovation Political Action Committee</b>		2. FEC IDENTIFICATION NUMBER <b>C00222810</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. <b>PO Box 426</b>		
CITY, STATE and ZIP CODE <b>Lewisville, TX 75067</b>	STATE/DISTRICT <b>75067</b>	3. IS THIS REPORT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

## 4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)
<input type="checkbox"/> July 15 Quarterly Report	election on _____ in the State of _____
<input type="checkbox"/> October 15 Quarterly Report	<input checked="" type="checkbox"/> Thirtieth day report following the General Election on <b>11/6/88</b> in the State of <b>Texas</b>
<input type="checkbox"/> January 31 Year End Report	
<input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only)	<input type="checkbox"/> Termination Report

This report contains activity for ☐ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

## SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<b>10/20/88 through 11/26/88</b>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(a))	<b>10,589.50</b>	<b>92,730.05</b>
(b) Total Contribution Refunds (from Line 20(b))		<b>3,000.00</b>
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	<b>10,589.50</b>	<b>89,730.05</b>
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	<b>7,435.00</b>	<b>24,359.73</b>
(b) Total Offsets to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	<b>7,435.00</b>	<b>24,359.73</b>
8. Cash on Hand at Close of Reporting Period (from Line 27)	<b>12,280.32</b>	
9. Debts and Obligations Owed TO the Committee (Remove all on Schedule C and/or Schedule D)		
10. Debts and Obligations Owed BY the Committee (Remove all on Schedule C and/or Schedule D)		

For further information contact:  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463  
Toll Free 800-424-9530  
Local 202-376-3120

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

Type or Print Name of Treasurer

SUSAN ARMEY

Signature of Treasurer

Susan Arme

Date

12/6/88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

**FEC FORM 3**  
(revised 4/87)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

Susan Armey, Treasurer  
Policy Innovation Political  
Action Committee  
P.O. Box 426  
Lewisville, TX 75067

JAN 25 1989

Identification Number: C00222810

Reference: 12 Day Pre-General Report (10/1/88-10/19/88)

Dear Ms. Armey:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Anthony Raymond on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

20040312355

REGULAR

Attachment 5

14 AM 11:15

FEB 9 1989

(Primary Page)

09F

1. NAME OF COMMITTEE (Print)

Billion / American Political Action Committee

PO Box 426

CITY, STATE and ZIP CODE

Lewisville, TX

75067

2. FEC IDENTIFICATION NUMBER

C00822810

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report☐ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (Pre-election Year Only)☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 28	<input type="checkbox"/> June 30	<input type="checkbox"/> October 30
<input type="checkbox"/> March 31	<input type="checkbox"/> July 31	<input type="checkbox"/> November 30
<input type="checkbox"/> April 30	<input type="checkbox"/> August 31	<input type="checkbox"/> December 31
<input type="checkbox"/> May 31	<input type="checkbox"/> September 30	<input type="checkbox"/> January 31

☒ Twelfth day report preceding General (Type of Election)election on 11/5/88 in the State of Texas☐ Thirtieth day report following the General Election on

In the State of \_\_\_\_\_

(b) Is this Report an Amendment?

☐ YES☒ NO

## SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>10/1/88</u> through <u>10/19/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 0 -
(b) Cash on Hand at Beginning of Reporting Period	\$ 32,545.83	
(c) Total Receipts (from Line 18)	\$ 13,870.00	\$ 82,147.55
(d) Subtotal (add Lines 6(b) and 6(c); for Column A and Line 6(a) and 6(c) for Column B)	\$ 46,385.83	\$ 82,147.55
7. Total Disbursements (from Line 28)	\$ 26,029.01	\$ 61,774.73
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 20,365.82	\$ 20,365.82
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/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

Type or Print Name of Treasurer

SUSAN BYRD ARME

Signature of Treasurer

Susan Byrd Arme

Date

2/5/89

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 11 U.S.C. §437g

FEC FORM 3X  
(revised 6/87)

30043058522P6

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Budget Summary Page

PAGE 00  
1 1 3  
FOR LINE NUMBER 2  
21

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

NAME OF COMMITTEE (in Full)

Policy Innovation Political Action Committee

A. Full Name, Mailing Address and ZIP Code Toby Roth for Congress 88 P.O. Box 8678 Appleton, WI 54913	Purpose of Disbursement Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/4/88	Amount of Each Disbursement This Period \$500.00
B. Full Name, Mailing Address and ZIP Code Col. Scomisano Committee to Reelect P.O. Box 83 Santa Barbara, CA 93102	Purpose of Disbursement Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/7/88	Amount of Each Disbursement This Period \$1,000.00
C. Full Name, Mailing Address and ZIP Code Tanya for Surgery P.O. Box 1297 Round Rock, TX 78680	Purpose of Disbursement Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/10/88	Amount of Each Disbursement This Period \$1,000.00
D. Full Name, Mailing Address and ZIP Code Hiller for Congress Committee 2516 Lincoln Way West Mishawaka, IN 46544	Purpose of Disbursement Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/10/88	Amount of Each Disbursement This Period \$1,000.00
E. Full Name, Mailing Address and ZIP Code Volunteers for Knox White 1540 D. Wade Hampton Blvd. Greenville, SC 29607	Purpose of Disbursement Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/14/88	Amount of Each Disbursement This Period \$2,000.00
F. Full Name, Mailing Address and ZIP Code Friends of Jim Gmaha P.O. Box 2585 Tulsa OK 74131	Purpose of Disbursement Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/14/88	Amount of Each Disbursement This Period \$1,000.00
G. Full Name, Mailing Address and ZIP Code Spence for Congress Comm. 4339 Chicago St. Columbus, OH 43224	Purpose of Disbursement Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/14/88	Amount of Each Disbursement This Period \$500.00
H. Full Name, Mailing Address and ZIP Code Fitzger for Congress 2105 Greenfield Paluch, AL 37602	Purpose of Disbursement Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/14/88	Amount of Each Disbursement This Period \$2,000.00
I. Full Name, Mailing Address and ZIP Code Doris L. Edwards for Congress P.O. Box 731 Spartanburg, SC 29305	Purpose of Disbursement Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/14/88	Amount of Each Disbursement This Period \$1,000.00

SUBTOTAL of Disbursements This Page (line one):

10,000.00

TOTAL for Period (last page this line number on):

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page

Page 2 of 3  
FOR LINE NUMBER 21

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

NAME OF COMMITTEE (in Full)

Policy Innovation Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Taylor for Congress 8 Jordan Mkt. Street Rt 1 Will. W. NC 27801	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/4/88	\$1,050.00
Chr. bat for Congress 2014 Hainan Ave. Cincinnati, OH 45211	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/1/88	\$200.00
Gidd for Congress 3623 Willow Lawn Dr. Springfield, IL 62703	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/1/88	\$250.00
Thomas callers for Congress P.O. Box 59 Jackson, MS 39206	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/1/88	\$1,000.00
Paxon for Congress P.O. Box 1927 East Aurora, NY 14052	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/1/88	\$1,000.00
Azzolina for Congress Conn 1715 Highway 35 Ste A4 Middletown, CT 06448	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/1/88	\$1,000.00
Thompson for Congress P.O. Box 52249 Austin, TX 78719	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/1/88	\$750.00
Flannery for Congress 322-C East Pershing Casper, WY 82406	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/14/88	\$200.00
Diore for Congress 5000 University Ave Casper, WY 82406	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/1/88	\$500.00

SUBTOTAL of Disbursements This Page (optional)

6,700.00

TOTAL of Disbursements This Page (number only)



## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Budgeted Summary Page

PAGE 3 of 3  
FOR LINE 17 AMBL

Any information copied from such Reports and Disbursements 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 contributors.

NAME OF COMMITTEE (in Full)

Policy Innovation Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Chris Cox for Congress 3500 Redwood Ave Suite 100 Santa Anna, CA 92705	Contribution US Rep Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/4/88	\$500.00
Dana Rohrabacher for Congress 35700 Cleveland Blvd #202 Torrance, CA 90505	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/4/88	\$500.00
Jarvis Smith for Congress 1809 Base Rd. Burlington, MS 39502	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/4/88	\$500.00
Douglas for Congress P.O. Box 1212 Concord, NH 03302	Contribution US Rep Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/4/88	\$500.00

SUBTOTAL of Disbursements This Page (optional)

\$2,000.00

TOTAL (include last page if this line number only)

\$5,500.00



FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

89MAR 30 AM 9:34

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral: 89NF-43  
Staff Member: Tamara Kapper

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Policy Innovation Political Action Committee and  
Susan Armey, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(ii)  
11 C.F.R. § 104.5(c)(1)(ii)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from  
the Reports Analysis Division ("RAD") on March 13, 1989.

(Attachment 1). The basis of the attached referral is the  
failure of Policy Innovation Political Action Committee and Susan  
Armey, as treasurer ("PIPAC") to file in a timely manner the 1988  
12 Day Pre-General Election Report.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the  
Act"), provides that for years in which regularly scheduled  
elections are held, all unauthorized committees shall file a pre-  
election report no later than the 12th day before any election in  
which such committee makes a contribution to or expenditure on  
behalf of a candidate in such election. 2 U.S.C.

§ 434(a)(4)(A)(ii). Thus, the due date for the 1988 12 Day Pre-

20040312260

General Report was October 27, 1988.

RAD notified PIPAC on October 3, 1988, that a 12 Day Pre-General Report was due on October 27, 1988, if contributions or expenditures were made in connection with the general election during the period October 1, 1988 to October 19, 1988. On December 19, 1988, PIPAC filed the 1988 30 Day Post-General Election Report and the beginning coverage date of the report, October 20, 1988, indicated that the 1988 12 Day Pre-General Report had not been filed. On January 25, 1989, RAD sent PIPAC a Non-Filer Notice for the 1988 12 Day Pre-General Report. On February 14, 1989, PIPAC filed the 1988 12 Day Pre-General Report disclosing twenty-two contributions to federal candidates totalling \$18,500. The report was filed 110 days late. Therefore, this Office recommends that the Commission open a MUR and find reason to believe PIPAC and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(ii).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

90040812261

90040312262

IV. Recommendations

1. Open a MUR.
2. Find reason to believe Policy Innovation Political Action Committee and Susan Armey, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), and enter into conciliation prior to probable cause to believe.

3. Approve the attached letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble  
General Counsel

March 29, 1989  
Date

BY:

George F. Rishel  
George F. Rishel  
Acting Associate General Counsel

Attachments

1. Referral Material
2. Proposed Agreement
3. Letter and Factual and Legal Analysis

90040812253

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Policy Innovation Political Action )  
Committee and Susan Armey, )  
as treasurer )

RAD Ref. 89NF-43

(*muh*  
*2843*)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 3, 1989, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 89NF-43:

1. Open a MUR.
2. Find reason to believe Policy Innovation Political Action Committee and Susan Armey, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), and enter into conciliation prior to probable cause to believe.
3. Approve the letter, Factual and Legal Analysis, and proposed conciliation agreement, as recommended in the First General Counsel's report signed March 29, 1989.

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

Attest:

4-3-89

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Thurs.,	3-30-89,	9:34
Circulated on 48 hour tally basis:	Thurs.,	3-30-89,	11:00
Deadline for vote:	Mon.,	4-03-89,	11:00

20040812264



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 7, 1989

Susan Armye, Treasurer  
Policy Innovation Political Action Committee  
P.O. Box 426  
Lewisville, Texas 75067

RE: MUR 2843  
Policy Innovation Political  
Action Committee and Susan  
Armye, as treasurer

Dear Ms. Armye:

On April 3, 1989, the Federal Election Commission found that there is reason to believe Policy Innovation Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

Susan Armey  
Page 2

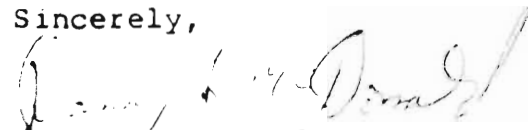
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the 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 Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

  
Danny L. McDonald  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Conciliation Agreement

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Policy Innovation Political                      MUR: 2843  
Action Committee and Susan Armey,  
as treasurer

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred Policy Innovation Political Action Committee and Susan Armey, as treasurer, ("PIPAC") to the Office of the General Counsel for failing to file the 1988 12 Day Pre-General Election Report in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for years in which regularly scheduled elections are held, all unauthorized committees shall file a pre-election report no later than the 12th day before any election in which such committee makes a contribution to or expenditure on behalf of a candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii).

The Respondents were required to file the 1988 12 Day Pre-General Report on October 27, 1988. The Respondents filed the 1988 Pre-General Report on February 14, 1989.

Therefore, there is reason to believe the Policy Innovation Political Action Committee and Susan Armey, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).



Policy  
Innovation

Political Action Committee

Dick Armey, MC  
Chairman

April 11, 1989

Mr. Danny L. McDonald  
Chairman  
Federal Election Commission  
Washington, DC 20463

Dear Mr. McDonald,

I am in receipt of your letter dated April 7, 1989 (MUR 2843) that suggests that the Policy Innovation Political Action Committee, and I as Treasurer, may have violated a provision of the Federal Election Campaign Act. The specific violation in question is whether or not the 12 day pre-general report was filed in a timely manner.

In reviewing my records, I find that the report was completed and signed before the due date. Policy Innovation PAC had contracted with M-Group, a political consulting company, to run the PAC and oversee the record keeping. My records show that the report was sent to M-Group for final checking and would be forwarded to the FEC in a timely manner. After checking with the president of M-Group, I was informed that he believes the report was filed, but he has no proof (such as a certified mail slip). After checking with my husband, Congressman Dick Armey, who heads this PAC as well as his campaign committee, I have been told that M-Group has sent other FEC reports in late in the past, but almost never more than a few days late. For this reason and others, M-Group was discharged as the consultant late last year.

Based on my records, I can conclude one of two things. Either the report was sent and lost in the mail or M-Group failed to send the report. As Treasurer, I do understand that I have the responsibility to file the report, but I was following procedures suggested to me by the Chairman.

My personal belief is that the report was filed, possibly a couple of days late, and lost in the mail. I, and others in the PIPAC organization, understand the importance of proper disclosure through the FEC. Since PIPAC is a relatively new organization, an honest mistake might have been made, but certainly no bad faith was intended if indeed the report was not filed properly.

P.O. Box 426, Lewisville, Texas 75067

Contributions to Political Action Committees are not deductible as charitable contributions for federal income tax purposes.  
Paid for by PIPAC

FEC--page two

Your letter mentions the possibility of entering into negotiations regarding this possible violation. Since I have no proof that the report was filed, a legal challenge would be a waste of effort on both our parts.

Sincerely,

  
Susan Army  
Treasurer

90040812269

06C3419

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

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

(202) 785-9500

FAX: (202) 835-0243

89 JUL 14 AM 10:00

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURKETT VAN FLECK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUG I. K. WEBSTER  
ANNE B. POPE

OF COUNSEL  
CHARLES E. CHAMBERLAIN

CONSULTANT  
A. L. SINGLETON

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE  
89 JUL 14 PM 3:17

July 13, 1989

Ms. Tamara Kapper  
Office of General Counsel  
Federal Election Commission  
999-E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2843; Policy Innovation  
Political Action Committee and  
Susan Armev, as Treasurer

Dear Ms. Kapper:

Please find enclosed copies of Designation of Counsel from Susan Armev and Policy Innovation Political Action Committee (PIPAC) in connection with MUR 2843. Jonathan Bernstein has the original copies of the Designation of Counsel.

As you may be aware, the late-filing violation asserted in MUR 2843 has also been asserted in MUR 2899, along with other alleged violations.

As Mrs. Armev and Congressman Armev previously have advised your office, PIPAC and Mrs. Armev are interested in exploring conciliation of MUR 2843. However, since the identical issue has been raised in MUR 2899 (to which our initial response is due on July 21, 1989), I do not want to have to deal with the issue twice.

I would appreciate your and Jonathan's suggestions as to how best to proceed.

Sincerely,

  
Frank M. Northam

FMN:dla  
Enclosures

cc: Jonathan Bernstein, Esq.

**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 2843

**NAME OF COUNSEL:** Frank Northam

**ADDRESS:** Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Suite 1000  
Washington, D.C. 20006

**TELEPHONE:** (202) 785-9500

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.

7-1-89  
**Date**

Susan Army  
**Signature**

**RESPONDENT'S NAME:** SUSAN Army

**ADDRESS:** 330 CA-720 CAIW

COPIES CA-720, TA 76226

**HOME PHONE:** \_\_\_\_\_

**BUSINESS PHONE:** \_\_\_\_\_

90040312271

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2843

NAME OF COUNSEL: Frank Northam

ADDRESS: Webster, Chamberlain & Bean  
1747 Pennsylvania Ave. NW  
Suite 1000  
Washington, D.C. 20006

TELEPHONE: (202) 785-9500

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.

7-1-89  
Date

Susan Armes  
Signature

RESPONDENT'S NAME: Policy Innovation Inc

ADDRESS: P.O. Box 426  
Louisville, TX 75067

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: \_\_\_\_\_

20040812272

OGC 3029

# John W. Caton

710 Midway  
Euless, Texas 76039  
817-571-5079

June 7, 1989

General Counsel  
Federal Election Commission  
999 E Street, NW.  
Washington, DC 20463

Dear General Counsel:

In accordance with complaint procedures stated in 11 CFR 111.4, I am submitting the originals and three copies each of five complaints against respondents associated with U.S. Representative Richard K. Armey and his committees, "Friends of Dick Armey" and "Policy Innovation Political Action Committee".

Each complaint complies with stated guidelines in that each includes my full name and address, are sworn to under penalties of perjury, each respondent is identified by name and address, allegations are clearly and consisely stated and documentation is clearly identified and attached to each complaint.

Sincerely,

  
John Wayne Caton

RECEIVED  
FEDERAL ELECTION COMMISSION  
JUN 13 1989  
AH 9:20

MUR 2899

Complainant,	) (	Before the
John Wayne Caton	) (	Federal Election
vs.	) (	Commission
Respondents,	) (	
Richard K. Armey, and	) (	
Susan Byrd Armey	) (	

89 JUN 13 PM 4:18

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF LEGAL COUNSEL

-----  
Complaint - Failure to file reports on timely basis  
-----

The complainant, John Wayne Caton, resides at 710 Midway Drive, Euless, Texas 76039.

Complainant brings to the Federal Election Commission's attention a complaint against Respondents,

U. S. Representative

Richard K. Armey

130 Cannon House Office Building

Washington, D.C. 20515

-and-

Susan Byrd Armey

330 Canyon Oaks Drive

Argyle, Texas 76220

Susan Byrd Armey is the designated treasurer of a Political Committee named "Policy Innovation Political Action Committee", FEC ID C00222810, which complainant has previously alleged to be an affiliated committee of "Friends of Dick Armey", FEC ID

C00198309, O.F. Henning, Jr. assistant treasurer. "Friends of Dick Armey" is the primary campaign committee of U. S. Representative Richard K. Armey.

Complainant alleges that Susan Byrd Armey, in violation of 11 CFR 104.5, on three occasions, failed to file Reports of Receipts and Disbursements for "Policy Innovation Political Action Committee" on a timely basis and by such action prevented the opposition candidate in the 1988 general election and the general public from being aware of certain irregularities until after the general election.

Specifically, The July 15 quarterly report was not filed until October 14, 1988, three months late (exhibit A). The Twelfth Day Preceding the General Election Report was due October 28, 1988 but was not filed until February 5, 1989, more than 3 months late (exhibit B). The Thirtieth Day After a General Election report was due December 8, 1988 but was not filed until February 1, 1989, almost two months late (exhibit C).

Under penalties of perjury, I hereby swear that to the best of my belief and knowledge, the statements made herein are true.



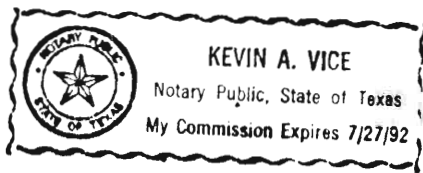
John Wayne Caton, Complainant



Subscribed to and sworn before me this 6 day of June,  
1989.

Kevin A. Vice / Kevin A. Vice

Notary Public



# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

IN THE OFFICE OF  
SECRETARY OF STATE

OCT 25 1988

Exhibit A

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>Policy Innovation Political Action Committee</b>		RECEIVED BY IDENTIFICATION NUMBER ELECTIONS DIVISION <b>C00222810</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>PO Box 426</b>	2. FEC IDENTIFICATION NUMBER <b>C00222810</b>	
CITY, STATE and ZIP CODE <b>Louisville, TX 75067</b>	3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).	

## 4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report  
☒ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-election Year Only)  
☐ Termination Report

### Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20  
☐ March 20 ☐ July 20 ☐ November 20  
☐ April 20 ☐ August 20 ☐ December 20  
☐ May 20 ☐ September 20 ☐ January 31

- ☐ 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 \_\_\_\_\_

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>April 1, 1988</u> through <u>June 30, 1988</u>		
6. (a) Cash on Hand January 1, 19____			\$ 0
(b) Cash on Hand at Beginning of Reporting Period	\$ 14309.41		
(c) Total Receipts (from Line 18)	\$ 6214.28		\$ 21,214.28
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 20,523.69		\$ 21,214.28
7. Total Disbursements (from Line 28)	\$ 9073.84		\$ 9764.43
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 11,449.85		\$ 11,449.85
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 522.75		

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

Type or Print Name of Treasurer  
**SUSAN ARMEY**  
Signature of Treasurer  
*Susan Armey*

Date  
**10/14/88**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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FEC FORM 3X  
(revised 4/87)

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

Exhibit B

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

FILED IN THE OFFICE OF  
SECRETARY OF STATE

1. NAME OF COMMITTEE (in full) <u>Policy Innovation Political Action Committee</u>		2. FEC IDENTIFICATION NUMBER <u>00222810</u>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <u>PO Box 426</u>		3. <input checked="" type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on <u>11/8/88</u> in the State of <u>Texas</u>
CITY, STATE and ZIP CODE <u>Lewisville, TX 75067</u>		

## 4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-election Year Only)  
☐ Termination Report

Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20  
☐ March 20 ☐ July 20 ☐ November 20  
☐ April 20 ☐ August 20 ☐ December 20  
☐ May 20 ☐ September 20 ☐ January 31

☒ Twelfth day report preceding General  
(Type of Election)

election on 11/8/88 in the State of Texas

☐ Thirtieth day report following the General Election on \_\_\_\_\_  
in the State of \_\_\_\_\_

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10/1/88</u> through <u>10/19/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>			\$ <u>0 -</u>
(b) Cash on Hand at Beginning of Reporting Period		\$ <u>32,565.83</u>	
(c) Total Receipts (from Line 18)		\$ <u>13,820.00</u>	\$ <u>82,140.55</u>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ <u>46,385.83</u>	\$ <u>82,140.55</u>
7. Total Disbursements (from Line 28)		\$ <u>26,020.01</u>	\$ <u>61,774.73</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ <u>20,365.82</u>	\$ <u>20,365.82</u>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>0</u>	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>0</u>	

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

Type or Print Name of Treasurer

Susan Byrd Arney

Signature of Treasurer

Susan Byrd Arney

Date

2/5/89

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X  
(revised 4/87)

# REPORT RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

Exhibit C

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>Policy Innovation Political Action Committee</b>		FILED IN THE OFFICE OF STATE
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>PO Box 426</b>		2. FEC IDENTIFICATION NUMBER <b>C00222610</b>
CITY, STATE and ZIP CODE <b>Louisville, KY 75067</b>		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on <b>DISCLOSURE</b> (date). ELECTIONS DIVISION

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

☐ February 20 ☐ June 20 ☐ October 20  
☐ March 20 ☐ July 20 ☐ November 20  
☐ April 20 ☐ August 20 ☐ December 20  
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding \_\_\_\_\_  
(Type of Election)

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

☒ Thirtieth day report following the General Election on

11/8/88 in the State of Texas

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

## SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>10/20/88</u> through <u>11/28/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ <u>0</u>
(b) Cash on Hand at Beginning of Reporting Period	\$ <u>20,365.82</u>	
(c) Total Receipts (from Line 18)	\$ <u>10,589.50</u>	\$ <u>92,730.05</u>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ <u>30,955.32</u>	\$ <u>92,730.05</u>
7. Total Disbursements (from Line 28)	\$ <u>18,675.00</u>	\$ <u>80,449.73</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ <u>12,280.32</u>	\$ <u>12,280.32</u>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ <u>0</u>	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ <u>0</u>	

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

Type or Print Name of Treasurer

**Susan Byrd Arney ASST. TREASURER**

Signature of Treasurer

*Susan Byrd Arney*

Date

2/1/89

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

**FEC FORM 3X**  
(revised 4/87)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

June 20, 1989

John Wayne Caton  
710 Midway Drive  
Euless, TX 76039

RE: MUR 2899


Dear Mr. Caton:

This letter acknowledges receipt on June 13, 1989, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Susan Armey, Congressman Richard K. Armey, O.F. Henning, Jr., Policy Innovation Political Action Committee and the Dick Armey Campaign. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 2899. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints. If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble  
General Counsel

By:   
Lois G. Lerner  
Associate General Counsel

Enclosure  
Procedures



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1989

Susan Armey, Treasurer  
Policy Innovation Political  
Action Committee  
P.O. Box 426  
Lewisville, TX 75067

RE: MUR 2899

Dear Mrs. Armey:

The Federal Election Commission received a complaint which alleges that the Committee and you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2899. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

By:  Lois G. Lerner  
Associate General Counsel

Enclosures

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

90040312282



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1989

Mike Keeling, Treasurer  
Dick Armey Campaign  
P.O. Box 85  
Lewisville, TX 75067

RE: MUR 2899

Dear Mr. Keeling:

The Federal Election Commission received a complaint which alleges that the Committee and you, as treasurer may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2899. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.



If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

20040312234



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

June 20, 1989

Congressman Richard K. Armey  
130 Cannon House Office Building  
Washington, DC 20515

RE: MUR 2899

Dear Mr. Armey:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2899. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

9 0 0 4 0 3 1 2 2 3 6



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1989

O.F. Henning, Jr.  
P.O. Box 85  
Lewisville, TX 75067

RE: MUR 2899

Dear Mr. Henning:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2899. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9204031237

**HAND DELIVERED** 066  
3502

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

89 JUL 21 AM 11:18

**LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN**

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 785-9500

FAX: (202) 835-0243

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

OF COUNSEL  
CHARLES E. CHAMBERLAIN  
CONSULTANT  
A. L. SINGLETON

July 20, 1989

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
89 JUL 21 PM 1:08

Jonathan Bernstein, Esq.  
Office of General Counsel  
Federal Election Commission  
999-E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2899/2843

Dear Mr. Bernstein:

This letter constitutes a response on behalf of Congressman Richard K. Armey, Mrs. Susan Armey, Treasurer of Policy Innovation Political Action Committee ("PIPAC"), PIPAC, and Mr. Michael F. Keeling, Treasurer of Friends of Dick Armey ("FODA"), Mr. O. F. Henning, Jr., Assistant Treasurer of FODA to the complaint filed by John Wayne Caton numbered MUR 2899, as well as a response to the ongoing conciliation negotiations in regard to MUR 2843.

In his complaint, Mr. Caton alleges that PIPAC was untimely in filing three reports with the FEC: 1) the July 15, 1988 quarterly report; 2) the Twelfth Day Preceding the General Election report for 1988; and 3) the Thirtieth Day after a General Election report for 1988.

The "Twelfth Day" report is the subject of the FEC's internally generated MUR 2843 and PIPAC and Mrs. Armey have previously responded to that MUR. Because of the overlap between the "Twelfth Day" report allegation in MUR 2899 and MUR 2843, we request that further conciliation efforts in MUR 2843 be postponed until the Commission has had an opportunity to address the allegations in MUR 2899.

Mr. Caton's allegations in regard to the July 15th quarterly report and the "Thirtieth Day" report are erroneous, since both reports were submitted on a timely basis. The copies of those reports attached to Mr. Caton's complaints as Exhibits A and C are copies of amended reports.

The initial reports are attached to this letter and show that the July 15th quarterly report was signed and submitted on July 14, 1988 and that the "Thirtieth Day" report was signed and

WEBSTER, CHAMBERLAIN & BEAN

Jonathan Bernstein, Esq.

July 20, 1989

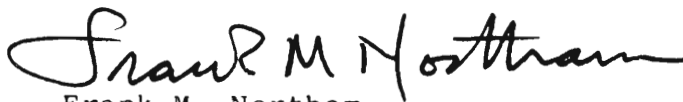
Page Two

submitted on December 6, 1988. Thus, both initial reports were timely.

Since the "Twelfth Day" report is being handled in MUR 2843 and the allegations as to the untimeliness of the other reports are groundless, the complaint in MUR 2899 should be dismissed.

The respondents to this MUR waive the confidentiality provisions of sections 437g(a)(4)(B) and 437g(a)(12)(A) of Title 2 and 11 C.F.R. §111.21.

Respectfully submitted,



Frank M. Northam

FMN:dla

90040312289

10700

1. NAME OF COMMITTEE (in full)  
**Policy Innovation Political Action Committee**

ADDRESS (number and street) ☐ Check if different than previously reported  
**30 Box 426**

CITY, STATE and ZIP CODE  
**Louisville, KY 40267**

2. FEC REGISTRATION NUMBER  
**C00222818**

3. ☐ This committee is subject to the biennial election cycle reporting period on \_\_\_\_\_ 20\_\_\_\_.

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
- ☒ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Pre-election Year Only)
- ☐ Termination Report

- Monthly Report Due On:
- |                                      |                                       |  |
|--------------------------------------|---------------------------------------|--|
| <input type="checkbox"/> February 28 | <input type="checkbox"/> June 30      | <input checked="" type="checkbox"/> October 30 |
| <input type="checkbox"/> March 31    | <input type="checkbox"/> July 31      | <input type="checkbox"/> November 30           |
| <input type="checkbox"/> April 30    | <input type="checkbox"/> August 31    | <input type="checkbox"/> December 31           |
| <input type="checkbox"/> May 31      | <input type="checkbox"/> September 30 |  |
- ☐ 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 \_\_\_\_\_

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>April 1, 1988 through June 30, 1988</u>		
6	(a) Cash on Hand January 1, 19 <u>88</u>		\$ <u>0</u>
	(b) Cash on Hand at Beginning of Reporting Period	\$ <u>14309.41</u>	
	(c) Total Receipts (from Line 18)	\$ <u>4614.28</u>	\$ <u>19,614.28</u>
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ <u>18,923.69</u>	\$
7	Total Disbursements (from Line 28)	\$ <u>9074.05</u>	\$ <u>9764.46</u>
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ <u>9849.64</u>	\$ <u>4849.82</u>
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10	Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$ <u>522.75</u>	

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

Type or Print Name of Treasurer  
**SUSAN ARMEY**

Signature of Treasurer \_\_\_\_\_ Date **7/14/88**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 9437g.

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FEC FORM 3X  
(revised 4/87)

**FEC FORM 3**  
(revised 4-87)



06C 3029

# John W. Caton

710 Midway  
Euless, Texas 76039  
817-571-5079

June 7, 1989

General Counsel  
Federal Election Commission  
999 E Street, NW.  
Washington, DC 20463

Dear General Counsel:

In accordance with complaint procedures stated in 11 CFR 111.4, I am submitting the originals and three copies each of five complaints against respondents associated with U.S. Representative Richard K. Armey and his committees, "Friends of Dick Armey" and "Policy Innovation Political Action Committee".

Each complaint complies with stated guidelines in that each includes my full name and address, are sworn to under penalties of perjury, each respondent is identified by name and address, allegations are clearly and consisely stated and documentation is clearly identified and attached to each complaint.

Sincerely,

  
John Wayne Caton

RECEIVED  
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JUN 13 AM 9:20

90040313293

89 JUN 13 PM 4:19

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK

O.F. Henning, Jr.  
P.O. Box 85  
Lewisville, Texas 75067.

-and/or-

Other unknown persons

4  
2  
2  
1  
3  
0  
4  
0  
0  
Susan Byrd Armey is the designated treasurer of a Political Committee named "Policy Innovation Political Action Committee", FEC ID C00222810, which complainant has previously alleged to be an affiliated committee of "Friends of Dick Armey", FEC ID C00198309, O.F. Henning, Jr. assistant treasurer. "Friends of Dick Armey" is the primary campaign committee of U. S. Representative Richard K. Armey.

Complainant alleges that Susan Byrd Armey, in violation of 11 CFR 104.14(a) did permit two or more unauthorized persons, namely Richard K. Armey, O.F. Henning, Jr. and/or other unknown persons to sign FEC Form 3X filings.

This allegation is based on the variance of signature styles as evidenced by exhibits A, B, C, D, and E, attached.

Under penalties of perjury, I hereby swear that to the best of my belief and knowledge, the statements made herein are true.

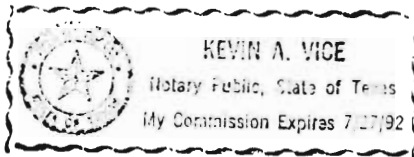


John Wayne Caton, Complainant

Subscribed to and sworn before me this 6 day of June,  
1989.

Kevin A. Vice / Kevin A. Vice

Notary Public



0040313295

# REPORT RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

IN THE OFFICE OF  
SECRETARY OF STATE

OCT 25 1988

Exhibit A

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>Policy Innovation Political Action Committee</b>		RECEIVED BY SECTION ELECTIONS DIVISION <b>CDO 222 810</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>PO Box 426</b>		
CITY, STATE and ZIP CODE <b>Louisville, TX 75067</b>		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☒ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ 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 \_\_\_\_\_

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

## SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>April 1, 1988</u> through <u>June 30, 1988</u>		
6. (a) Cash on Hand January 1, 19____		\$ 0
(b) Cash on Hand at Beginning of Reporting Period	\$ 14309.41	
(c) Total Receipts (from Line 18)	\$ 6214.28	\$ 21,214.28
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 20,523.69	\$ 21,214.28
7. Total Disbursements (from Line 28)	\$ 9073.84	\$ 9764.43
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 11,449.85	\$ 11449.85
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 522.75	

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

Type or Print Name of Treasurer

**SUSAN ARMEY**

Signature of Treasurer

*Susan Arme*

Date

**10/14/88**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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**FEC FORM 3X**  
(revised 4/87)

# REPORT RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

FILED IN THE OFFICE OF  
SECRETARY OF STATE

OCT 19 1988

Exhibit B

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>Policy Innovation Political Action Committee</b>		2. FEC IDENTIFICATION NUMBER <b>000222810</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>PO Box 426</b>		
CITY, STATE and ZIP CODE <b>Lewisville TX 75067</b>		3. <input checked="" type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on <b>9/30/88</b> (date).

## 4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☒ October 15 Quarterly Report  
☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-election Year Only)

Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20  
☐ March 20 ☐ July 20 ☐ November 20  
☐ April 20 ☐ August 20 ☐ December 20  
☐ May 20 ☐ September 20 ☐ January 31

☐ 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 \_\_\_\_\_

- (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, 1988</u> through <u>Sept 30, 1988</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ <u>0</u>
(b) Cash on Hand at Beginning of Reporting Period	\$ <u>11,449.85</u>	
(c) Total Receipts (from Line 18)	\$ <u>47,106.27</u>	\$ <u>68,320.55</u>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ <u>58,556.12</u>	\$ <u>68,320.55</u>
7. Total Disbursements (from Line 28)	\$ <u>25,990.29</u>	\$ <u>35,754.72</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ <u>32,565.83</u>	\$ <u>32,565.83</u>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ <u>-0-</u>	

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

Type or Print Name of Treasurer

**SUSAN ARMEY**

Signature of Treasurer

*Susan Armeay*

Date

**10/14/88**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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FEC FORM 3X

(revised 4/87)

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

Exhibit C

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>Policy Innovation Political Action Committee</b>		2. FEC IDENTIFICATION NUMBER <b>C00222810</b>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>PO Box 299157</b>		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE <b>Lewisville, TX 75029 - 9157</b>		

## 4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☒ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-election Year Only)  
☐ Termination Report

Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20  
☐ March 20 ☐ July 20 ☐ November 20  
☐ April 20 ☐ August 20 ☐ December 20  
☐ May 20 ☐ September 20 ☐ January 31

- ☐ 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 \_\_\_\_\_

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>11/29/88</u> through <u>12/31/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>			\$ <u>0</u>
(b) Cash on Hand at Beginning of Reporting Period		\$ <u>12,280.32</u>	
(c) Total Receipts (from Line 18)		\$ <u>-0-</u>	\$ <u>92,730.05</u>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ <u>12,280.32</u>	\$ <u>92,730.05</u>
7. Total Disbursements (from Line 28)		\$ <u>1,669.23</u>	\$ <u>82,118.96</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ <u>10,611.09</u>	\$ <u>10,611.09</u>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>0</u>	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>0</u>	

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

Type or Print Name of Treasurer

Susan Byrd Arney

Signature of Treasurer

Susan Byrd Arney

Date

1/31/89

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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**FEC FORM 3X**  
(revised 4/87)

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

Exhibit D

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>Policy Innovation Political Action Committee</b>		FILED IN THE OFFICE OF STATE
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>PO Box 426</b>		2. FEC IDENTIFICATION NUMBER <b>C00222610</b>
CITY, STATE and ZIP CODE <b>Louisville, KY 75067</b>		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on DISCLOSURE STATEMENTS SECTION ELECTIONS DIVISION

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

☐ February 20    ☐ June 20    ☐ October 20  
☐ March 20    ☐ July 20    ☐ November 20  
☐ April 20    ☐ August 20    ☐ December 20  
☐ May 20    ☐ September 20    ☐ January 31

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)

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

☒ Thirtieth day report following the General Election on

11/8/88 in the State of Texas

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10/20/88</u> through <u>11/28/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>			\$ <u>0</u>
(b) Cash on Hand at Beginning of Reporting Period		\$ <u>20,365.82</u>	
(c) Total Receipts (from Line 18)		\$ <u>10,589.50</u>	\$ <u>92,730.05</u>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ <u>30,955.32</u>	\$ <u>92,730.05</u>
7. Total Disbursements (from Line 28)		\$ <u>18,675.00</u>	\$ <u>80,449.73</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ <u>12,280.32</u>	\$ <u>12,280.32</u>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>0</u>	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>0</u>	

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

Type or Print Name of Treasurer

Susan Byrd Arney ASST. TREASURER

Signature of Treasurer

Susan Byrd Arney

Date

2/1/89

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

**FEC FORM 3X**  
(revised 4/87)



# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

Exhibit BE

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

FILED IN THE OFFICE OF  
SECRETARY OF STATE

1. NAME OF COMMITTEE (in full) <u>Policy Innovation Political Action Committee</u>		2. FEC IDENTIFICATION NUMBER <u>600222810</u>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <u>PO Box 426</u>		3. <input checked="" type="checkbox"/> This committee qualified as a multicandidate committee during this reporting period on <u>11/8/88</u> (date).
CITY, STATE and ZIP CODE <u>Lewisville, TX 75067</u>		

## 4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-election Year Only)  
☐ Termination Report

Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20  
☐ March 20 ☐ July 20 ☐ November 20  
☐ April 20 ☐ August 20 ☐ December 20  
☐ May 20 ☐ September 20 ☐ January 31

☒ Twelfth day report preceding General (Type of Election)

election on 11/8/88 in the State of Texas

☐ Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10/1/88</u> through <u>10/19/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>			\$ <u>0 -</u>
(b) Cash on Hand at Beginning of Reporting Period		\$ <u>32,565.83</u>	
(c) Total Receipts (from Line 18)		\$ <u>13,820.00</u>	\$ <u>82,140.55</u>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ <u>46,385.83</u>	\$ <u>82,140.55</u>
7. Total Disbursements (from Line 28)		\$ <u>26,020.01</u>	\$ <u>61,774.73</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ <u>20,365.82</u>	\$ <u>20,365.82</u>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>0</u>	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>0</u>	

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

Type or Print Name of Treasurer

Susan Byrd Arney

Signature of Treasurer

Susan Byrd Arney

Date

2/5/89

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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FEC FORM 3X  
(revised 4/87)



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

June 20, 1989

John Wayne Caton  
710 Midway Drive  
Euless, TX 76039

RE: MUR 2900

Dear Mr. Caton:

This letter acknowledges receipt on June 13, 1989, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Susan Armey, Congressman Richard K. Armey, O.F. Henning, Jr., Policy Innovation Political Action Committee and the Dick Armey Campaign. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 2900. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints. If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble  
General Counsel

By:   
Lois S. Lerner  
Associate General Counsel

Enclosure  
Procedures

90040812301



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1989

O.F. Henning, Jr.  
P.O. Box 85  
Lewisville, TX 75067

RE: MUR 2900

Dear Mr. Henning:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2900. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

2004031303



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1989

Congressman Richard K. Armey  
130 Cannon House Office Building  
Washington, DC 20515

RE: MUR 2900

Dear Mr. Armey:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2900. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

By:   
Lois G. Kerner  
Associate General Counsel

Enclosures

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

20040312305



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

June 20, 1989

Susan Armey, Treasurer  
Policy Innovation Political  
Action Committee  
P.O. Box 426  
Lewisville, TX 75067

RE: MUR 2900

Dear Mrs. Armey:

The Federal Election Commission received a complaint which alleges that the Committee and you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2900. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

90040312307





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1989

Mike Keeling, Treasurer  
Dick Armey Campaign  
P.O. Box 85  
Lewisville, TX 75067

RE: MUR 2900

Dear Mr. Keeling:

The Federal Election Commission received a complaint which alleges that the Committee and you, as treasurer may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2900. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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FEDERAL ELECTION COMMISSION  
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LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006

89 JUL 21 AM 11:18

GEORGE P. WEBSTER  
J. TOLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

(202) 785-9500  
FAX: (202) 835-0243

OF COUNSEL  
CHARLES E. CHAMBERLAIN  
CONSULTANT  
A. L. SINGLETON

July 20, 1989

Jonathan Bernstein, Esq.  
Office of General Counsel  
Federal Election Commission  
999-E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2900

Dear Mr. Bernstein:

This letter constitutes a response on behalf of Congressman Richard K. Armey, Mrs. Susan Armey, Mr. O. F. Henning, Jr., Policy Innovation Political Action Committee ("PIPAC"), and Mr. Michael F. Keeling, Treasurer of Friends of Dick Armey ("FODA") to the complaint filed by Mr. John Wayne Caton and numbered MUR 2900.

Mrs. Armey is the designated treasurer of PIPAC and, in his complaint, Mr. Caton alleges that Mrs. Armey "did permit two or more unauthorized persons" to sign FEC Form 3X filings that were made on behalf of PIPAC.

Mrs. Armey denies that any "unauthorized" person has ever been permitted to sign FEC filings for PIPAC. She does recall one occasion on which she gave verbal authorization to an individual, whose identity she does not recall, to sign FEC Forms 3X on her behalf. Although Mrs. Armey had reviewed and approved the information to be included in the reports, when the reports were in final form and ready to be signed and sent to the FEC, Mrs. Armey was out of town. Because there was some urgency involved in getting the forms signed and filed before Mrs. Armey would be back in town, she authorized the signing of her name to the forms.

Because Mrs. Armey exercised her "best efforts" to submit the FEC reports as required, we do not believe that there has been any violation of law. See, 11 C.F.R. §104.7(a). Nevertheless, PIPAC is in the process of designating an assistant treasurer who can sign reports or otherwise act in the absence of the treasurer.

For all of the foregoing reasons, the complaint in MUR 2900 should be dismissed.

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
89 JUL 21 PM 1:08

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WEBSTER, CHAMBERLAIN & BEAN


Jonathan Bernstein, Esq.

July 20, 1989

Page Two

The respondents to this MUR waive the confidentiality provisions of sections 437g(a)(4)(B) and 437g(a)(12)(A) of Title 2 and 11 C.F.R. §111.21.

Respectfully submitted,



Frank M. Northam

FMN:dla

90040812310

06C 3029

# John W. Caton

710 Midway  
Euless, Texas 76039  
817-571-5079

June 7, 1989


General Counsel  
Federal Election Commission  
999 E Street, NW.  
Washington, DC 20463

Dear General Counsel:

In accordance with complaint procedures stated in 11 CFR 111.4, I am submitting the originals and three copies each of five complaints against respondents associated with U.S. Representative Richard K. Armey and his committees, "Friends of Dick Armey" and "Policy Innovation Political Action Committee".

Each complaint complies with stated guidelines in that each includes my full name and address, are sworn to under penalties of perjury, each respondent is identified by name and address, allegations are clearly and consisely stated and documentation is clearly identified and attached to each complaint.

Sincerely,

  
John Wayne Caton

FEDERAL RECEIVED  
OFFICE OF THE FEDERAL ELECTION COMMISSION  
89 JUN 13 AM 9:20

1132804002

MUR 2901

Complainant, ) ( Before the  
John Wayne Caton ) ( Federal Election  
vs. ) ( Commission  
Respondents, ) (  
Richard K. Armey, ) (  
Susan Byrd Armey, ) (  
O.F. Henning, Jr.,  
Will Radcliff,  
David Fox,  
Bill Brown,  
Arnold Petsche,  
Ernet Maherd,  
Jim Adams,  
Al Alfred,  
Donald E. Grimm,  
James Lightner,  
Robert Carrel,  
Bill King,  
Don Hudspeth, and  
The Right to Work Political Action Committee,

-----  
Complaint - Illegally excessive contributions to affiliated  
political committees.  
-----

The complainant, John Wayne Caton, resides at 710 Midway  
Drive, Euless, Texas 76039.

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
89 JUN 13 PM 4:18

Complainant brings to the Federal Election Commission's  
attention a complaint against Respondents,

U. S. Representative

Richard K. Armey

130 Cannon House Office Building

Washington, D.C. 20515

-and-

Susan Byrd Armey

330 Canyon Oaks Drive

Argyle, Texas 76220

-and-

O.F. Henning, Jr.

P.O. Box 85

Lewisville, Texas 75067

-and-

Will Radcliff

1950 Radcliff Drive

Cincinnati, Ohio 45204

-and-

David Fox

4208 Thanksgiving Tower

1601 Elm Street, LB49

Dallas, Texas 75201-4752

-and-

90040312313

Bill Brown

900 Meadows Bldg.

Dallas, Texas 75206

-and-

Arnold Petsche

AE Petsche Co., Inc.

2112 W. Division

Arlington, Texas 76012

-and-

Ernet Maherd

P.O. Box 248

Prosper, Texas 75078

-and-

Jim Adams

17807 Cedar Creek Canyon

Dallas, texas 75252

-and-

Al Alfred

Hunt Properties

1900 Thanksgiving Square

1601 Elm Street

Dallas, Texas 75201

-and-

90040812314

Donald E. Grimms  
W.R. Grace and Co.  
5953 Club Oaks Drive  
Dallas, Texas 75348

-and-

James Lightner  
Electrospace Systems  
5905 Steuben Ctr.  
Dallas, Texas 75248

-and-

Robert Carrel  
Electrospace Systems  
5220 Briar Tree  
Dallas, Texas 75248

-and-

Bill King  
B & D Enterprises  
15300 Midway Rd.  
Dallas, Texas 75244

-and-

Don Hudspeth  
P.O. Box 241  
Valley View, Texas 76272

-and-



The Right to Work Political Action Committee

5420 Port Royal Rd. Suite 211

Springfield, Va 22151

Respondent Susan Byrd Armey is the designated treasurer of a Political Committee named "Policy Innovation Political Action Committee", FEC ID C00222810.

"Friends of Dick Armey", FEC ID C00198309, (Respondent O.F. Henning, Jr. assistant treasurer) is the primary campaign committee of Respondent U. S. Representative Richard K. Armey.

Respondents Will Radcliff, David Fox, Bill Brown, Arnold Petsche, Ernet Maherd, Jim Adams, Al Alfred, Donald E. Grimm, James Lightner, Robert Carrel, Bill King, Don Hudspeth and The Right to Work Political Action Committee are contributors to either or both "Friends of Dick Armey" and "Policy Innovation Political Action Committee".

In accordance with 11 CFR 100.5(g)(2)(i)(E) and 11 CFR 100.5(g)(2)(ii), Complainant alleges that "Friends of Dick Armey" and "Policy Innovation Political Action Committee" are affiliated political committees controlled by the same person or group of persons associated with U.S. Representative Richard K. Armey.

As affiliated committees, aggregate contributions to either or both committees are limited in accordance with 11 CFR 110.1 (b)(1) and 11 CFR 110.2 (b).

Complainant alleges that contributions received from Respondents Radcliff, Fox, Brown, Petcher, Maherd, Adams, Alfred,

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2040312317

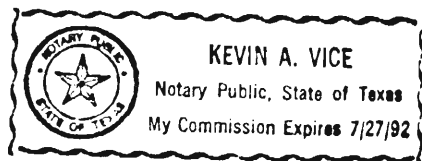
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2040312317

Subscribed to and sworn before me this 10 day of June,  
1989.

Kevin A. Vice / Kevin A. Vice

Notary Public



90040312318

LEA

# Exhibit A

## ITEM RECEIPTS

 Unseparate schedule(s)  
 for category of the  
 Detailed Summary Page

 PAGE 11  
 OF 11  
 FOR LINE NUMBER 11(a)(i)

No information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees.

NAME OF COMMITTEE (in Full)

Policy Innovation Political Action Committee

<b>A. Full Name, Mailing Address and ZIP Code</b> BEN E. Tate, Jr. 7754. Carnegie Rd. Cincinnati, OH 45243 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> N/A <b>Occupation</b> Aggregate Year-to-Date > \$ 900	<b>Date (month, day, year)</b> 10/25/88 11/1/88	<b>Amount of Each Receipt this Period</b> 500.00 400.00
<b>B. Full Name, Mailing Address and ZIP Code</b> David W. Warner 8880 Old Indian Hill Rd Cincinnati, OH 45243 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> N/A <b>Occupation</b> Aggregate Year-to-Date > \$ 1000	<b>Date (month, day, year)</b> 11/6/88	<b>Amount of Each Receipt this Period</b> 1000.00
<b>C. Full Name, Mailing Address and ZIP Code</b> Will Radcliff 1950 Radcliff Dr Cincinnati, OH 45204 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> N/A <b>Occupation</b> Aggregate Year-to-Date > \$ 2400	<b>Date (month, day, year)</b> 11/8/88	<b>Amount of Each Receipt this Period</b> 2400.00
<b>D. Full Name, Mailing Address and ZIP Code</b> R. E. Thompson & Co. PO Box 1302 Lewisville, TX 75607 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> SELF <b>Occupation</b> EXECUTIVE Aggregate Year-to-Date > \$ 200	<b>Date (month, day, year)</b> 11/17/88	<b>Amount of Each Receipt this Period</b> 200.00
<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> Aggregate Year-to-Date > \$	<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> Aggregate Year-to-Date > \$	<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> Aggregate Year-to-Date > \$	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt this Period</b>

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

4,500.00

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# Exhibit B ITEMIZED RECEIPTS

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

PAGE 115  
OF 115  
FOR LINE NUMBER 112(i)

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

OF COMMITTEE (in Full)

## POLICY INNOVATION POLITICAL ACTION COMMITTEE

<p>A. Full Name, Mailing Address and ZIP Code Doyle, Maureen 250 W. 90th Street New York, NY 10024</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer N/A</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 250</p>	<p>Date (month, day, year) 07/29/88</p>	<p>Amount of Each Receipt this Period \$550.00</p>
<p>B. Full Name, Mailing Address and ZIP Code Beckwith, Iris A. Jr. Park Place on Turtle Creek 2911 Turtle Creek Suite 1000 Dallas, TX 75219</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Self</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 1000</p>	<p>Date (month, day, year) 8/30/88</p>	<p>Amount of Each Receipt this Period \$1,000.00</p>
<p>C. Full Name, Mailing Address and ZIP Code Fox, Daniel 4209 Shanksview Tower 1601 Elm St. LB49 Dallas, TX 75201-452</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer N/A</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 2000</p>	<p>Date (month, day, year) 8/30/88</p>	<p>Amount of Each Receipt this Period \$2,000.00</p>
<p>D. Full Name, Mailing Address and ZIP Code Bauer, Bill 100 Meadows Bldg. Dallas, TX 75206</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Self</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 5000</p>	<p>Date (month, day, year) 8/30/88</p>	<p>Amount of Each Receipt this Period 4,000.00</p>
<p>E. Full Name, Mailing Address and ZIP Code Clampitt, Max Clampitt Paper Co. 4207 Ambassador Bldg. Dallas, TX 75247</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Self</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 1000</p>	<p>Date (month, day, year) 8/30/88</p>	<p>Amount of Each Receipt this Period \$1,000.00</p>
<p>F. Full Name, Mailing Address and ZIP Code Pickens, R.H. 800 M Bank Austin Bldg. 3111 Preston Rd. Dallas, TX 75225</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer N/A</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 1000</p>	<p>Date (month, day, year) 8/30/88</p>	<p>Amount of Each Receipt this Period \$1,000.00</p>
<p>G. Full Name, Mailing Address and ZIP Code Pertsche, Arnold AE Pertsche Co. Inc 3112 W. Division Arlington, Texas 76010</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Self</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 2000</p>	<p>Date (month, day, year) 8/30/88</p>	<p>Amount of Each Receipt this Period 4,200.00</p>

SUBTOTAL of Receipts This Page (optional)

11,250.00

TOTAL This Period (last page this line number only)

LE A

# ITEMIZED RECEIPTS

Use: [ ] Schedule(s)  
for each category of the  
Detailed Summary Page

PAGE 2 OF 5  
FOR LINE NUMBER 11211

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

NAME OF COMMITTEE (in Full)

Policy Innovation Political Action Committee

<p>A. Full Name, Mailing Address and ZIP Code Harvey Jones 3228 Campbell Bowie Blvd PO Box 9600 Ft. Worth, TX 76107-0600</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer N/A</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 1000</p>	<p>Date (month, day, year) 8/30/88</p> <p>Amount of Each Receipt this Period \$1,000.00</p>
<p>B. Full Name, Mailing Address and ZIP Code Crunkshank, Tom Halliburton Co. 3000 Simsbury Pkwy Dallas, TX 75201-3291</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Halliburton</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 1000</p>	<p>Date (month, day, year) 8/30/88</p> <p>Amount of Each Receipt this Period \$1,000.00</p>
<p>C. Full Name, Mailing Address and ZIP Code Mabardi, Ernest PO Box 248 Prosper, TX 75078</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer SELF</p> <p>Occupation Farmer</p> <p>Aggregate Year-to-Date &gt; \$ 2000</p>	<p>Date (month, day, year) 8/30/88</p> <p>Amount of Each Receipt this Period \$2,000.00</p>
<p>D. Full Name, Mailing Address and ZIP Code Adams, Jim 17807 Cedar Creek Canyon Dallas, TX 75252</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer S.W. Bell</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 2000</p>	<p>Date (month, day, year) 9/1/88</p> <p>Amount of Each Receipt this Period \$2,000.00</p>
<p>E. Full Name, Mailing Address and ZIP Code Barbee, Lynn 2800 Mountain Place 1717 Main Dallas, TX 75201</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation Attorney</p> <p>Aggregate Year-to-Date &gt; \$ 500</p>	<p>Date (month, day, year) 9/1/88</p> <p>Amount of Each Receipt this Period \$1,500.00</p>
<p>F. Full Name, Mailing Address and ZIP Code Jasline, Troy 529 Magnolia Denton, TX 76201</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Bent Keith</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 1000</p>	<p>Date (month, day, year) 9/2/88</p> <p>Amount of Each Receipt this Period \$1,000.00</p>
<p>G. Full Name, Mailing Address and ZIP Code Jim Sowell, Sowell Co. 1112 Copeland Rd. Suite 400 Arlington, TX 76011-4554</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Sowell Co.</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 1000</p>	<p>Date (month, day, year) 9/5/88</p> <p>Amount of Each Receipt this Period \$1,000.00</p>

SUBTOTAL of Receipts This Page (optional)

7500.00

TOTAL This Period (last page this line number only)

# Exhibit 0 ITEMIZED RECEIPTS

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

PAGE 3 OF 5  
FOR LINE NUMBER 11a(i)

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

NAME OF COMMITTEE (in Full)

Policy Innovation Political Action Committee

<p>A. Full Name, Mailing Address and ZIP Code young, black, J. Lee P.O. Box 1865 Dallas, TX 75221</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer N/A</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 500</p>	<p>Date (month, day, year) 9/9/88</p>	<p>Amount of Each Receipt this Period \$500.00</p>
<p>B. Full Name, Mailing Address and ZIP Code alfred al Hunt Properties 1900 W. McAllen 1601 E. 1st St Dallas, TX 75201</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Hunt Properties</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 2000</p>	<p>Date (month, day, year) 9/12/88</p>	<p>Amount of Each Receipt this Period \$2,000.00</p>
<p>C. Full Name, Mailing Address and ZIP Code Nelson, Jim Majesty Mfg. Co. PO Box 60380 Tempe, AZ 85286</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Majesty Mfg.</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 1000</p>	<p>Date (month, day, year) 9/12/88</p>	<p>Amount of Each Receipt this Period \$1,000.00</p>
<p>D. Full Name, Mailing Address and ZIP Code O'Reilly, Charles 1101 Garrison Drive Richardson, TX 75080</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer SA 1A</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date &gt; \$ 1000</p>	<p>Date (month, day, year) 9/15/88</p>	<p>Amount of Each Receipt this Period \$1,000.00</p>
<p>E. Full Name, Mailing Address and ZIP Code Morison, Robert 2982 Birn Rd. Ashland, OH 44004</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer N/A</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 1000</p>	<p>Date (month, day, year) 9/15/88</p>	<p>Amount of Each Receipt this Period \$1,000.00</p>
<p>F. Full Name, Mailing Address and ZIP Code Grinn, Donald E W.R. Grace and Co. 5953 Club Oaks Dr Dallas, TX 75248</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer W.R. Grace</p> <p>Occupation Exec.</p> <p>Aggregate Year-to-Date &gt; \$ 3000</p>	<p>Date (month, day, year) 9/15/88</p>	<p>Amount of Each Receipt this Period \$2,000.00</p>
<p>G. Full Name, Mailing Address and ZIP Code Lightner, James Electrospace Systems 3905 Steuber Cir Dallas, TX 75248</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Electrospace</p> <p>Occupation Exec.</p> <p>Aggregate Year-to-Date &gt; \$ 5000</p>	<p>Date (month, day, year) 9/15/88</p>	<p>Amount of Each Receipt this Period \$2,000.00</p>

SUBTOTAL of Receipts This Page (optional)

9500.00

TOTAL This Period (last page this line number only)



**Exhibit E**  
**ITEM RECEIPTS**

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

PAGE 4 OF 5  
FOR LINE NUMBER 11a(i)

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

NAME OF COMMITTEE (in Full)

*Policy Innovation Political Action Committee*

<p><b>A. Full Name, Mailing Address and ZIP Code</b> <i>Carrel, Robert</i> <i>Electospace Systems</i> <i>5220 Buena Vista</i> <i>Dallas, TX 75248</i></p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer <i>Electospace</i></p> <p>Occupation <i>Exec.</i></p> <p>Aggregate Year-to-Date &gt; \$ <i>5000</i></p>	<p>Date (month, day, year) <i>9/15/88</i></p>	<p>Amount of Each Receipt this Period <i>\$2,000.00</i></p>
<p><b>B. Full Name, Mailing Address and ZIP Code</b> <i>King, Bill</i> <i>B&amp;D Enterprises</i> <i>15300 Midway Rd.</i> <i>Dallas, TX 75244</i></p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer <i>B&amp;D Enterprises</i></p> <p>Occupation <i>Exec.</i></p> <p>Aggregate Year-to-Date &gt; \$ <i>5000</i></p>	<p>Date (month, day, year) <i>9/19/88</i></p>	<p>Amount of Each Receipt this Period <i>\$15,000.00</i></p>
<p><b>C. Full Name, Mailing Address and ZIP Code</b> <i>Crosby, Riley</i> <i>309 Roberts Circle</i> <i>Arlington, TX 76010</i></p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer <i>Self</i></p> <p>Occupation <i>Exec.</i></p> <p>Aggregate Year-to-Date &gt; \$ <i>1000</i></p>	<p>Date (month, day, year) <i>9/23/88</i></p>	<p>Amount of Each Receipt this Period <i>\$1,000.00</i></p>
<p><b>D. Full Name, Mailing Address and ZIP Code</b> <i>Felderhoff, Al</i> <i>F&amp;F Partners</i> <i>PO Box 7129</i> <i>Cansville, TX 75240</i></p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer <i>F&amp;F Enterprises</i></p> <p>Occupation <i>Exec.</i></p> <p>Aggregate Year-to-Date &gt; \$ <i>1000</i></p>	<p>Date (month, day, year) <i>9/23/88</i></p>	<p>Amount of Each Receipt this Period <i>\$1,000.00</i></p>
<p><b>E. Full Name, Mailing Address and ZIP Code</b> <i>Hallam, Robert</i> <i>Bare K. with Bens.</i> <i>1805 Peridot Crossing</i> <i>Dallas, TX 75235</i></p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer <i>Kon E. Keith</i></p> <p>Occupation <i>Exec.</i></p> <p>Aggregate Year-to-Date &gt; \$ <i>1000</i></p>	<p>Date (month, day, year) <i>9/23/88</i></p>	<p>Amount of Each Receipt this Period <i>\$1,000.00</i></p>
<p><b>F. Full Name, Mailing Address and ZIP Code</b> <i>McCaslin, JD</i> <i>J.D. McCaslin &amp; Co. Inc.</i> <i>Two Girard Ct. A.</i> <i>5420 LBS Highway Suite 370</i> <i>Dallas, TX 75240</i></p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer <i>J.D. McCaslin Inc.</i></p> <p>Occupation <i>Exec.</i></p> <p>Aggregate Year-to-Date &gt; \$ <i>1000</i></p>	<p>Date (month, day, year) <i>9/27/88</i></p>	<p>Amount of Each Receipt this Period <i>\$1,000.00</i></p>
<p><b>G. Full Name, Mailing Address and ZIP Code</b> <i>Smith, Henry "Bud"</i> <i>Clark/Bardes Org. Inc.</i> <i>3811 Turtle Creek Blvd. Ste 1200</i> <i>Dallas, TX 75219</i></p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer <i>Clark/Bardes Org. Inc.</i></p> <p>Occupation <i>Exec.</i></p> <p>Aggregate Year-to-Date &gt; \$ <i>1000</i></p>	<p>Date (month, day, year) <i>9/27/88</i></p>	<p>Amount of Each Receipt this Period <i>\$1,000.00</i></p>

SUBTOTAL of Receipts This Page (optional)

*13,000.00*

TOTAL This Period (last page this line number only)



RULE A.

## ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE 515 OF  
FOR LINE NUMBER 11a(i)

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

NAME OF COMMITTEE (in Full)

Policy Innovation Political Action Committee

<b>A. Full Name, Mailing Address and ZIP Code</b> Mitchell, William 6039 Glendora Dallas, TX 75230  <b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Texas Instruments  <b>Occupation</b> Exec  <b>Aggregate Year-to-Date</b> > \$ 250	<b>Date (month, day, year)</b> 9/28/88	<b>Amount of Each Receipt this Period</b> \$ 250.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Lundelius, Charles P.O. Box 809084 Dallas, TX 75380-1194  <b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Markham Inc.  <b>Occupation</b> Exec  <b>Aggregate Year-to-Date</b> > \$ 1000	<b>Date (month, day, year)</b> 9/28/88	<b>Amount of Each Receipt this Period</b> \$ 1,000.00
<b>C. Full Name, Mailing Address and ZIP Code</b> Hualapath, Don PO Box 241 Valley View, TX 76072  <b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> Self  <b>Occupation</b> Exec.  <b>Aggregate Year-to-Date</b> > \$ 2000	<b>Date (month, day, year)</b> 9/9/88	<b>Amount of Each Receipt this Period</b> 2000.00
<b>D. Full Name, Mailing Address and ZIP Code</b>    <b>Receipt For:</b> <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>    <b>Receipt For:</b> <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>    <b>Receipt For:</b> <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>    <b>Receipt For:</b> <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>   

SUBTOTAL of Receipts This Page (optional)

3250.00

TOTAL This Period (last page this line number only)

44,500.00

200040812324

Exhibit G

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

NAME OF COMMITTEE (in Full)

POLICY INNOVATION POLITICAL ACTION COMMITTEE

<p>A. Full Name, Mailing Address and ZIP Code Turning Point Political Action Committee 111 North Post Oak Ln Houston, TX 77024</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 3000.00</p>	<p>Date (month, day, year) 10/11/88</p>	<p>Amount of Each Receipt this Period 3000.00</p>
<p>B. Full Name, Mailing Address and ZIP Code The Right to Work Political Action Committee 5240 Port Royal Road Springfield, VA 22151</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 2500.00</p>	<p>Date (month, day, year) 10/11/88</p>	<p>Amount of Each Receipt this Period 2500.00</p>
<p>C. Full Name, Mailing Address and ZIP Code Southwestern Bell Corporation Englewood, CO</p>	<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>

ULE A

ITEMIZED RECEIPTS

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

PAGE 1 OF 1  
FOR LINE NUMBER 11(c)

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

NAME OF COMMITTEE (in Full)

Policy Innovation Political Action Committee

<p>A. Full Name, Mailing Address and ZIP Code The Right to Work Political Action Committee 5420 Port Royal Rd, Ste 211 Springfield, VA 22151</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 2000</p>	<p>Date (month, day, year) 10/26/88</p>	<p>Amount of Each Receipt this Period 2000.00</p>
<p>B. Full Name, Mailing Address and ZIP Code Turning Point Political Action Committee 111 North Post Oak Houston, TX 77024</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 3000</p>	<p>Date (month, day, year) 11/1/88</p>	<p>Amount of Each Receipt this Period 3000.00</p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>

Name of Employer Date (month, day, year) Amount of Each

ITEMIZED RECEIPTS

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

PAGE 1 OF 4  
FOR LINE NUMBER 11(c)

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

NAME OF COMMITTEE (in Full)

FRIENDS OF DICK ARMEY

<p>A. Full Name, Mailing Address and ZIP Code Chrysler Political Support Committee</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10/12/88</p>	<p>Amount of Each Receipt this Period 250.00</p>
<p>B. Full Name, Mailing Address and ZIP Code The Right to Work Political Action Committee 5240 Port Royal Rd. Ste 211 Springfield, VA 22151</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10/12/88</p>	<p>Amount of Each Receipt this Period 2500.00</p>
<p>C. Full Name, Mailing Address and ZIP Code NSA STONEPAC 1415 ELLIOT PLACE N.W. Washington, DC 20007</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10/12/88</p>	<p>Amount of Each Receipt this Period 250.00</p>
<p>D. Full Name, Mailing Address and ZIP Code Vol. Contributors for Better Gov. 1620 Eye St. N.W. Suite 700 Washington, DC 20004</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10/12/88</p>	<p>Amount of Each Receipt this Period 4,100.00</p>
<p>E. Full Name, Mailing Address and ZIP Code Wall &amp; Ceiling Political Action Committee 25 K St. N.E. Washington, DC 20002</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10/12/88</p>	<p>Amount of Each Receipt this Period \$ 250.00</p>
<p>F. Full Name, Mailing Address and ZIP Code Public Service Political Action Committee 8330 Old Courthouse Rd. St. 600 Vienna, VA 22180</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10/12/88</p>	<p>Amount of Each Receipt this Period \$ 250.00</p>
<p>G. Full Name, Mailing Address and ZIP Code H.B. Zachary Co. Political Action Committee P.O. Box 21130 S.A. TX 78285</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10/12/88</p>	<p>Amount of Each Receipt this Period \$ 250.00</p>

SUBTOTAL of Receipts This Page (optional)

5000.00

TOTAL This Period (last page this line number only)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

John Wayne Caton  
710 Midway Drive  
Euless, TX 76039

RE: MUR 2901

Dear Mr. Caton:

This letter acknowledges receipt on June 13, 1989, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Susan Armey, Congressman Richard K. Armey, O.F. Henning, Jr., Will Radcliff, David Fox, Bill Brown, Arnold Petsche, Ernet Maherd, Jim Adams, Al Alfred, Donald E. Grimm, James Lightner, Robert Carrel, Bill King, Don Hudspeth, Dick Armey Campaign, Right to Work Political Action Committee and Policy Innovation Political Action Committee. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints. If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble  
General Counsel

By: Lois G. Lerner  
Associate General Counsel

Enclosure  
Procedures

90040812327



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Susan Arney, Treasurer  
Policy Innovation Political  
Action Committee  
P.O. Box 426  
Lewisville, TX 75067

RE: MUR 2901

Dear Mrs. Arney:

The Federal Election Commission received a complaint which alleges that the Committee and you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

By:   
Lois G. Lerner  
Associate General Counsel

Enclosures

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

20040812329



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Congressman Richard K. Armey  
130 Cannon House Office Building  
Washington, DC 20515

RE: MUR 2901

Dear Mr. Armey:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

By:   
Lois G. Lerner  
Associate General Counsel

Enclosures

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

20040312331





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

O.F. Henning, Jr.  
P.O. Box 85  
Lewisville, TX 75067

RE: MUR 2901

Dear Mr. Henning:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

By:   
Lois G. Lerner  
Associate General Counsel

Enclosures

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

200040312333



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Will Radcliff  
1950 Radcliff Drive  
Cincinnati, OH 45204

RE: MUR 2901

Dear Mr. Radcliff:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

By:   
Lois G. Lerner  
Associate General Counsel

Enclosures

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

20040312335



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

David Fox  
4208 Thanksgiving Tower  
1601 Elm Street, LB49  
Dallas, TX 75201-4752

RE: MUR 2901

Dear Mr. Fox:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

By:   
Lois G. Lerner  
Associate General Counsel

Enclosures

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

20040312337



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Bill Brown  
900 Meadows Building  
Dallas, TX 75206

RE: MUR 2901

Dear Mr. Brown:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Kerner  
Associate General Counsel

Enclosures

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

90040812339





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Arnold Petsche  
AE Petsche Co., Inc.  
2112 W. Division  
Arlington, TX 76012

RE: MUR 2901

Dear Mr. Petsche:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

By:   
Lois G. Lerner  
Associate General Counsel

Enclosures

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

90040812341



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Ernet Maherd  
P.O. Box 248  
Prosper, TX 75078

RE: MUR 2901

Dear Mr. Maherd:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

90040312343



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Jim Adams  
17807 Cedar Creek Canyon  
Dallas, TX 75252

RE: MUR 2901

Dear Mr. Adams:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

90040812345



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Al Alfred  
Hunt Properties  
1900 Thanksgiving Square  
1601 Elm Street  
Dallas, TX 75201

RE: MUR 2901

Dear Mr. Alfred:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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20040311346

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

90040812347





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Donald E. Grimm  
W.R. Grace and Company  
5953 Club Oaks Drive  
Dallas, TX 75348

RE: MUR 2901

Dear Mr. Grimm:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Verner  
Associate General Counsel

Enclosures

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

90040812349



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

James Lightner  
Electrospace Systems  
5905 Steuben Center  
Dallas, TX 75248

RE: MUR 2901

Dear Mr. Lightner:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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900403130

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

20040312351



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Robert Carrel  
Electrospace Systems  
5220 Briar Tree  
Dallas, TX 75248

RE: MUR 2901

Dear Mr. Carrel:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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2004031252

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

90040312353



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Bill King  
B & D Enterprises  
15300 Midway Road  
Dallas, TX 75244

RE: MUR 2901

Dear Mr. King:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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90040312354

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

20040312355





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Don Hudspeth  
P.O. Box 241  
Valley View, TX 76272

RE: MUR 2901

Dear Mr. Hudspeth:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

9 3 3 4 0 3 1 3 3 5 7



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Reed E. Larson, Treasurer  
Right To Work Political  
Action Committee  
5240 Port Royal Road, Suite 211  
Springfield, VA 22151

RE: MUR 2901

Dear Mr. Larson:

The Federal Election Commission received a complaint which alleges that the Committee and you, as treasurer may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

20040313359



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Mike Keeling, Treasurer  
Dick Armey Campaign  
P.O. Box 85  
Lewisville, TX 75067

RE: MUR 2901

Dear Mr. Keeling:

The Federal Election Commission received a complaint which alleges that the Committee and you, as treasurer may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2901. Please refer to this number in all future correspondence.

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

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Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

90040312361

WILLIAM H. BOWEN

SUITE 900 MEADOWS BLDG

DALLAS, TEXAS 75208

(214) 691-0711

89 JUL -3 AM 9:05

June 29, 1989

Mr. Lawrence M. Noble  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2901

Dear Mr. Noble:

A letter dated June 21, 1989, with regard to the above-referenced matter was addressed to "Bill Brown" at my office address here in Dallas. Since there is no such person at this office, I assume that the complaint referred to is directed to me.

I have contributed to the Friends of Dick Armey Committee in the past. In addition, I also have made a financial contribution to the Policy Innovation Political Action Committee. It was my understanding at the time of these contributions, and remains my understanding to this date, that those two committees were independent of one another and that my contributions were within the legal limits allowed under the law. It is my further understanding that the Policy Innovation Political Action Committee fulfilled all of the requirements under the law to qualify as a multi-candidate political action committee. I was so informed at the time of my contribution to that committee and continue to believe that any contribution I made to PIPAC qualifies under the law.

If you have any additional questions, please do not hesitate to contact me.

Yours truly,



William H. Bowen

jh

89 JUL -3 PM12:30

RECEIVED  
FEDERAL ELECTION COMMISSION

90040312362

acc 3308

WILLIAM L. KING

FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE SERVICES

89 JUL -3 AM 9:13

June 28, 1989

RECEIVED  
FEDERAL ELECTION COMMISSION  
89 JUL -3 PM 12:30

Mr. Lawrence M. Noble  
General Counsel  
Federal Election Commission  
Washington, DC 20463

Re: MUR 2901

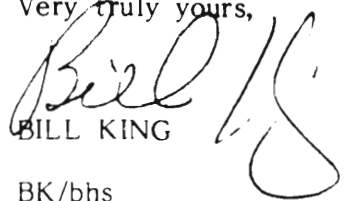
Dear Mr. Noble:

In response to Lois Lerner's letter of June 21, 1989 regarding my contribution of \$5,000 on September 19, 1988 to the Policy Innovation Political Action Committee, my contribution was made with the clear cut understanding that this was a legally constituted political action committee.

The limited research I have been able to do since receipt of Ms. Lerner's letter supports the above assumptions.

I trust the above will close the books on this question.

Very truly yours,

  
BILL KING

BK/bhs

90040312363



Doc 3299

Right  
to Work

# POLITICAL ACTION COMMITTEE

June 30, 1989

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
89 JUL -3 PM 12:31

Lois G. Lerner  
Associate General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2901


Dear Ms. Lerner:

We are in receipt of your June 21 correspondence notifying us of the complaint filed against us with respect to contributions made to the Policy Innovation Political Action Committee and the Friends of Dick Arney committee.

We are and were unaware of any affiliated status between these two committees and note that the complaint filed by John Caton sets forth very few factual allegations in support of his claim of affiliation.

We await further word and guidance from the Commission on this matter.

Sincerely,

  
Reed E. Larson  
Treasurer

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE SERVICES  
89 JUL -3 AM 8:39

06C 3319

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 JUL -5 AM 10:35

DAVID G. FOX  
4208 THANKSGIVING TOWER  
1601 ELM STREET, LB 44  
DALLAS, TEXAS 75201-4752  
A/C 214 754-0950

June 29, 1988

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
89 JUL -5 AM 11:30

Mr. Lawrence M. Noble  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Attention Ms. Lois G. Lerner, Associate General Counsel

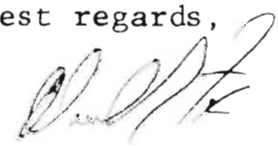
Re: Complaint MUR2901

Dear Ms. Lerner:

I did contribute \$2,000 to PIPAC in 1988, which was well within the legal limits of \$5,000.

To the best of my knowledge, the PIPAC is properly constituted as a multicandidate political action committee.

Best regards,



DGF:bw

1004031355

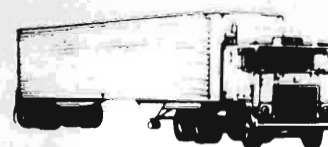
06C 3325

# DON HUDSPETH

P.O. Box 241  
Valley View, Texas 76272-0241  
Office: 817-726-3270  
Metro: 214-434-1034  
WATTS: (Outside Texas) 800-824-0273

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 JUL -6 AM 10:44



July 5, 1989

Mr. Lawrence M. Noble  
Federal Election Commission  
General Counsel  
999 E Street NW  
Room 657  
Washington, D. C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
89 JUL -6 PM 1:24

RE: MUR 2901

Dear Mr. Noble,

This letter is in response to a complaint filed against me by John Wayne Caton (MUR 2901).

As I understand, the maximum allowable contribution to a Political Action Committee is \$5,000.00 per year for an individual, therefore I gave \$2,000.00 to the Policy Innovation Political Action Committee believing it to be a legal contribution and I still believe it to be.

Thanks for your consideration in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Don Hudspeth".

Don Hudspeth

DH:kr

0603323

FRANK R. JELINEK, INC.

*Attorney at Law*

FRANK R. JELINEK  
ATTORNEY AT LAW

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

89 JUL 11 AM 10:53

801 E. ABRAM  
SUITE 102  
ARLINGTON, TEXAS 76010  
METRO 817-461-1100

July 7, 1989

Ms. Lois G. Lerner  
Associate General Counsel  
**Federal Election Commission**  
Washington, D.C. 20463

Re: **MUR 2901**; Complaint filed by **John Wayne Caton vs.**  
**Richard A. Armey, Arnold E. Petsche, et al**

Dear Ms. Lerner:

Pursuant to your notice letter and Complaint Procedures, I am enclosing my client's Statement of Designation of Counsel that has been signed by him, so that you will be authorized to send all notifications regarding the above-captioned matter to my office in his behalf.

My client vehemently denies that he, individually, has violated the terms and provisions of the Federal Election Campaign Act of 1971 (the "Act").

A review of the Complaint indicates on Page 5 thereof that Complainant believes and alleges, upon information and belief only, that the "Friends of Dick Armey" and the "Policy Innovation Political Action Committee" are affiliated political committees, controlled by the same person or group of persons associated with Congressman Richard K. Armey. The complaint is not based on any factual evidence but only by conclusions that are asserted.

The Respondent, Arnold E. Petsche, does not believe that a contribution to the Policy Innovation Political Action Committee (PIPAC) is an affiliated committee to Congressman Richard K. Armey. In this connection see 11 CFR 100.5(g)(2)(ii), and the failure by complainant to show the required indicia of "control" or similar patterns of contributions or transfer of funds between committees.

89 JUL 11 PM 1:05

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FEDERAL ELECTION COMMISSION  
OFFICE OF COMPLAINTS

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The Respondent, Arnold E. Petsche, believes that his contributions to PIPAC were qualified contributions to a multicandidate committee, and were proper in accordance with 11 CFR 110.1(h). Further, my client was specifically advised orally and in writing that the funds being solicited by PIPAC were for a separate unaffiliated organization, and that contributions were limited to \$5,000.00. His contribution was within that limitation. My client was further advised that no sums being contributed to PIPAC would be used or transferred to the principal campaign committee for Richard K. Armey. Thus, there would be no violation of 11 CFR 110.1(b)(1) or 11 CFR 110.2(b).

If further investigation on the part of the Commission becomes warranted, please let me know. Otherwise, I will assume that no further action will be taken and that my file can be closed. Please file mark the extra copy of the letter enclosed herein and return it to me so that I will know that it has been received.

If you or your staff should have any questions, please do not hesitate to call or write my office, as I will be more than happy to assist you in any way that I can.

Sincerely yours,

  
Frank R. Jelinek

FRJ/dsu:

cc: Mr. Arnold E. Petsche  
cc: Mr. Richard K. Armey  
cc: Mr. John Wayne Caton

**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 2901

**NAME OF COUNSEL:** Frank R. Jelinek

**ADDRESS:** 801 E. Abram, Suite 102  
Arlington, Texas 76010

**TELEPHONE:** 817- 461-1100

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.

July 3, 1989  
**Date**

Arnold E. Petsche  
**Signature** Arnold E. Petsche

**RESPONDENT'S NAME:** Arnold E. Petsche

**ADDRESS:** 2211 Shadywood Ct.  
Arlington, Texas 76012

**HOME PHONE:** 817 -

**BUSINESS PHONE:** 817-461-9473

2040312359

06 C 33 78

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

Robert Carrel  
5220 Briar Tree  
Dallas, Texas 75248

89 JUL 11 AM 11:55

Lawrence M. Noble  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2901

Dear Mr. Noble:

In reply to your letter of June 21, 1989, on the above subject, received by me on June 23, 1989, I offer the following:

1. To the best of my knowledge and belief, my contributions were to separate committees within legal limits.
2. At the time I made the contribution to the "Policy Innovation Political Action Committee", my understanding was that the committee was separate, different and not affiliated with Congressman Armey's campaign committee.

Please consider the above statements under oath and I have signed this letter in front of a notary public.

Very truly yours,

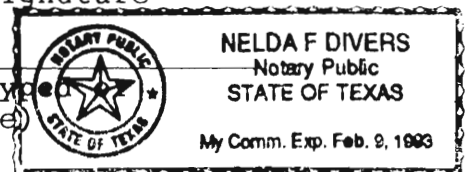
  
Robert Carrel

STATE OF TEXAS  
COUNTY OF DALLAS

SUBSCRIBED AND SWORN TO before me on the 5th day  
of July, 1989.

  
(Notary's signature)

(Notary's typ  
printed name)



(SEAL)

My commission expires \_\_\_\_\_

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
89 JUL 11 PM 1:04

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John G. Rebensdorf  
Attorney at Law  
1900 Thanksgiving Tower  
1601 Elm St.  
Dallas, Texas 75201  
(214) 220-2257

56C 3388  
RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

89 JUL 12 AM 10:58

June 30, 1989

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

CERTIFIED MAIL  
P 665 969 763

Attn: Office of General Counsel

Re: MUR 2901

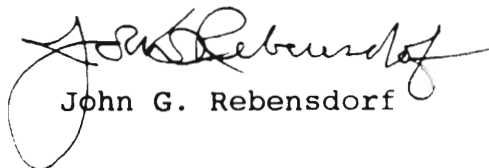
Dear Sir:

I have been retained to represent Mr. A. L. Allred who is one of the Respondents in the above-referenced complaint. An executed Statement of Designation of Counsel is enclosed with this letter.

Please be advised that on September 9, 1988, Mr. Allred contributed \$2,000 to the Policy Innovation Political Action Committee ("PIPAC") on behalf of himself and his wife, Lyda H. Allred. A copy of Mr. Allred's cancelled check is attached to this letter. This contribution was premised on the understanding and assumption that PIPAC was a properly organized political action committee in compliance with the Federal Election Campaign Act of 1971. The contribution of \$2,000 is well within the limitation of \$5,000 for contributions to political action committees established by 11 CFR 110.1(d)(1). In addition, the contributions of \$1,000 for each of Mr. Allred and his wife are within the limitations for contributions to individual candidates established by 11 CFR 110.1(b)(1).

Based upon the foregoing, no action should be taken against Mr. Allred with respect to this complaint. Thank you for your consideration of this matter.

Sincerely,

  
John G. Rebensdorf

JGR:lg

cc: Mr. A. L. Allred

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
89 JUL 12 PM 11:51



STATEMENT OF DESIGNATION OF COUNSEL

MUR 2901

NAME OF COUNSEL: John G. Rebensdorf

ADDRESS: 1900 Thanksgiving Tower

1601 Elm Street

Dallas, Texas 75201

TELEPHONE: (214) 220-2257

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.

6/30/89  
Date

Alfred L. Allred  
Signature

RESPONDENT'S NAME: Alfred L. Allred

ADDRESS: 1900 Thanksgiving Tower

1601 Elm Street

Dallas, Texas 75201

HOME PHONE: --

BUSINESS PHONE: (214) 880-9090

9004031372

ALFRED ALLRED  
3601 GILLON  
DALLAS, TEXAS 75205

9/8 19 88

1096

PAY TO THE ORDER OF PIPAC \$ 2,000.00

Two Thousand and no/100's ----- DOLLARS

**MBank** Preston

8111 Preston Road  
Dallas, Texas 75225

FOR Contribution *Alfred*

⑆111000928⑆ ⑈105850⑈1014⑈ 1096 ⑈0000200000⑈

CLARK CASH

90040812373

[illegible]

OGC 3389

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

89 JUL 12 AM 9:00

5953 Club Oaks Drive  
Dallas, TX 75248

27 June 1989

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
89 JUL 12 PM 11:51

FEDERAL ELECTION COMMISSION  
Washington, DC 20463

Attention: General Counsel's Office

RE: MUR 2901

Gentlemen:

This is in response to your letter of June 21, 1989, enclosing a complaint filed by John Wayon Caton alleging that my contribution to "Policy Innovation Political Action Committee" constituted a violation of the Federal Election Campaign Act of 1971.

At the time I made my contribution to "Policy Innovation Political Action Committee", I was advised that this fund was not affiliated with "Friends of Dick Armey", and that funds contributed to it would be made available to candidates other than Dick Armey.

Sincerely,

  
Donald E. Grimm

90040312375

06C 3430

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

89 JUL 17 AM 9:40

July 11, 1989

Lois G. Lerner  
Federal Election Commission  
1325 K Street, NW  
Washington, D.C. 20463

Re: MUR 2901

Dear Lois Lerner:

Please be advised that contribution made by my wife and I to Policy Innovation Political Action Committee and Friends of Dick Armey were made with the clear understanding that these are two separate and distinct organizations.

Sincerely,

  
Ernest Mahard

EM/mb

89 JUL 17 PM 3:53

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

0040812376

06C 3462

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

89 JUL 19 AM 9:52

*James R. Lightner*

5905 Steuben Ct.  
Dallas, TX 75248  
(214) 380-1017

July 5, 1989

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C.

Attention: Lawrence M. Noble, General Counsel

In response to your letter dated June 21, 1989, re: MUR2901, which I received on June 23, 1989, I am taking the opportunity afforded to me under the Federal Election Campaign Act of 1971 to demonstrate in writing that no action should be taken against me in this matter. I understand Congressman Armey's attorney is submitting something to you on some of the legal issues involved. As for my part, I submit the following facts for your consideration.

1. When I made the contributions alleged in the complaint to the "Policy Innovation Political Action Committee", I thought it was a separate committee, not connected with the "Friends of Dick Armey" committee. I based my contributions on the understanding that the two committees were, in fact, separate committees and not connected.
2. To the best of my knowledge, my contributions to the separate committees were within the legal limits allowed by law.

I submit the foregoing under oath.

Sincerely,

*James R. Lightner*  
James R. Lightner

STATE OF TEXAS  
COUNTY OF DALLAS

SUBSCRIBED AND SWORN TO before me on the 5th day of July, 1989.

*Lea Ann Bailey*  
(Notary's signature)

Lea Ann Bailey  
(Notary's typed or printed name)

(SEAL)

My commission expires 2-17-92

89 JUL 19 PM 2:47

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

2004081237

**HAND DELIVERED**

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

**89 JUL 19 AM 9:55**

0603463  
Southwestern Bell  
Telephone

James R. Adams  
President and  
Chief Executive Officer

1010 Pine Street  
St. Louis, Missouri 63101  
Phone (314) 235-2600

July 14, 1989

Federal Election Commission  
Mr. Lawrence M. Noble  
General Counsel  
1325 K Street, NW  
Washington D.C. 20463

Re: MUR 2901

Dear Mr. Noble:

This is in response to the Complaint which has been filed against me, as well as others, with regard to contributions made to the Policy Innovation Political Action Committee.

First of all, please be advised that my home address has changed from 17807 Cedar Creek Canyon, Dallas, Texas, as reflected in your records. My new address is #3 Dromara Road, St. Louis, Missouri 63124.

With regard to the Complaint, I wish to advise you that my wife and I made contributions to the Policy Innovation Political Action Committee from our joint account in the following amounts and on the following dates:

\$500            March 4, 1988  
\$1,000        August 30, 1988

These are the only contributions which we made in 1988 to the Policy Innovation Political Action Committee. It was my understanding that the earlier contribution was with regard to the primary election and that the later contribution was with regard to the general election held that year.

In addition to the above two contributions, my wife and I made a contribution in the amount of One Thousand Dollars to the Dick Armey campaign. I cannot locate the check evidencing that contribution, but

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FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
89 JUL 19 PM 12:47

90040812378

Mr. Frank Duffy  
Page 2  
July 14, 1989

believe that the contribution was made in September or October of 1988. I also cannot specifically recall whether or not that contribution was made to the Friends of Dick Armey Political Action Committee, which is one of the PACs mentioned in the Complaint.

Neither my wife nor I performed any work for any PAC; nor did we hold any office with any PAC; nor did we retain any control over any of the funds which we contributed to the Policy Innovation Political Action Committee or the Dick Armey campaign.

I have never intended to circumvent or otherwise violate the Federal Election Campaign Act. Since your transmittal letter to me asked for my statement to be submitted under oath, I am having this letter notarized.

If anything further is needed from me, please advise.

Sincerely,

*J R Adams*

State of Missouri )  
City of St. Louis ) ss.

Before me personally appeared James R. Adams, being first duly sworn upon his oath, and stated that the facts stated herein are true and correct to the best of his knowledge, information and belief.

*Beata M. Gordon*

Notary

My commission expires: 11-2-90

BEATA M. GORDON  
NOTARY PUBLIC, STATE OF MISSOURI  
COMMISSION EXPIRES: NOV. 2, 1990

90040312379



**HAND DELIVERED**

OGC  
3500

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

89 JUL 21 AM 11:18

LAW OFFICES  
**WEBSTER, CHAMBERLAIN & BEAN**  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006

(202) 785-9500  
FAX: (202) 835-0243

OF COUNSEL  
CHARLES E. CHAMBERLAIN  
CONSULTANT  
A. L. SINGLETON

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

July 20, 1989

Jonathan Bernstein, Esq.  
Office of General Counsel  
Federal Election Commission  
999-E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2901

Dear Mr. Bernstein:

This letter constitutes a response on behalf of Congressman Richard K. Armey, Mrs. Susan Armey, Trasurer of Policy Innovation Political Action Committee ("PIPAC"), Mr. Michael F. Keeling, Treasurer of Friends of Dick Armey ("FODA"), Mr. O. F. Henning, Jr., Assistant Treasurer of FODA, PIPAC and FODA to the complaint filed by Mr. John Wayne Caton and numbered MUR 2901.

In his complaint, Mr. Caton alleges that PIPAC and FODA are "affiliated" committees and, therefore, share an aggregate limitation on the amount of contributions that may be received from individuals and other political committees. He further alleges that a list of named individuals are contributors to either or both PIPAC and FODA. (As to the individuals, Mr. Caton has attached as exhibits only reports of PIPAC. Those reports indicate that many of the individuals contributed \$1,000.00 or less to PIPAC and Mr. Caton has presented no evidence of those individuals' contributions to FODA.) Finally, Mr. Caton alleges that The Right to Work Political Action Committee made contributions to both PIPAC and FODA which would exceed persmissible limits if the two committees were affiliated.

These respondents, in their response to MUR 2897, have fully detailed why Mr. Caton's allegations that PIPAC and FODA are affiliated must be dismissed by the Commission, and that response is incorporated herein by reference.

To the extent, if any, that Mr. Caton, in MUR 2901, is attempting to argue that there is a pattern of similar contributions to PIPAC and FODA that demonstrates affiliation, his complaint must fail. First, other than The Right to Work PAC, he has

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OFFICE OF GENERAL COUNSEL

WEBSTER, CHAMBERLAIN & BEAN

Jonathan Bernstein, Esq.

July 20, 1989

Page Two

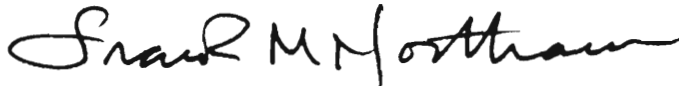
presented no evidence of similar contributions to PIPAC and FODA. Second, in this MUR and the other MURs filed by Mr. Caton, PIPAC and FODA have firmly denied that they are affiliated or that they have engaged in any concerted operations. Third, given the similarity of the ideological and political goals of FODA and PIPAC, it would not be surprising if some of the same people and political committees contributed to both. In MUR 1870, the General Counsel found these same three factors to be persuasive in concluding that there was no evidence of shared lists or fundraising efforts that would point to affiliation.

Since FODA and PIPAC have conclusively demonstrated that they are not affiliated committees, none of Mr. Caton's allegations of excessive contributions is worth examining. FODA and PIPAC are independent and each has its own separate contribution limits. There is no allegation that any of the separate contributions to PIPAC or FODA exceeded those limits.

Therefore, Mr. Caton's complaint should be dismissed.

The respondents to this MUR waive the confidentiality provisions of sections 437g(a)(4)(B) and 437g(a)(12)(A) of Title 2 and 11 C.F.R. §111.21.

Respectfully submitted,



Frank M. Northam

FMN:dla

NOV 29 3:44

FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

**SENSITIVE**

**FIRST GENERAL COUNSEL'S REPORT**

MUR # 2899, 2900,  
2901, and MUR 2843  
DATE COMPLAINT RECEIVED  
BY OGC: June 13, 1989  
DATE OF NOTIFICATION TO  
RESPONDENTS: June 21, 1989  
STAFF MEMBERS: Bernstein/Kapper

COMPLAINANT: John Wayne Caton

RESPONDENTS: Congressman Richard K. Armey  
Susan Armey  
O.F. Henning, Jr.  
Ernest Mahard  
Will Radcliff  
James Lightner  
Jim Adams

Bill King  
Bill Bowen  
David Fox  
Don Hudspeth  
Robert Carrel

Arnold Petsche  
Donald E. Grimm  
Al Allred  
Dick Armey Campaign and Mike F. Keeling,  
as treasurer  
Policy Innovation Political Action  
Committee and Susan Armey, as treasurer

Right to Work Political Action Committee  
and Reed E. Larson, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(i), (ii) and (iii)  
2 U.S.C. § 433(b)(2)  
2 U.S.C. § 434(a)(1)  
2 U.S.C. § 434(b)(2)(A)  
2 U.S.C. § 441a(a)(1)  
2 U.S.C. § 441f  
11 C.F.R. § 110.4(b)(2)(ii)

INTERNAL REPORTS CHECKED: Disclosure Reports

2 1 4 0 3 1 3 8 2

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

On June 13, 1989, the Commission received five separate external complaints filed by John Wayne Caton. The respondents and allegations appear to overlap.

In MUR 2899, the complainant alleges that Susan Army, the treasurer of PIPAC, filed three (3) disclosure reports late in violation of 2 U.S.C. § 434(a)(4)(A)(i), (ii) and (iii). In MUR 2900, the complainant alleges that Susan Army allowed other persons to sign her name to PIPAC's reports in violation of 2 U.S.C. § 434(a)(1). Finally in MUR 2901, the complainant alleges that twelve individuals made excessive contributions to PIPAC in violation of 2 U.S.C. § 441a(a)(1), as a result of PIPAC's asserted affiliation with DAC. It is also alleged that the Right To Work Political Action Committee made excessive contributions to both PIPAC and DAC. as a result of their alleged affiliation in violation of 2 U.S.C. § 441a(a)(2)(A).

Respondents were duly notified of the complaints. Seven respondents requested and received extensions of time to respond to the complaints. The last of these responses were received by the Commission on July 24, 1989.

In MUR 2843, an internally generated matter, the Commission had previously found on April 3, 1989, reason to believe that PIPAC and Susan Armey, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) by filing the 1988 12 Day Pre-General Report late. Also, on that same date, the Commission decided to enter into conciliation prior to finding probable cause to believe.

Since the complaint in MUR 2899 alleges the late filing of the 12 Day Pre-General Report, Respondents have requested that the matters be treated together and to postpone pre-probable cause conciliation in MUR 2843. This Office concurs that the better course would be to discuss all relevant matters in a combined report. Accordingly, this Office has suspended pre-probable cause conciliation negotiations. Following the evaluation of all the responses, this Office will report to the Commission with appropriate recommendations.

Lawrence M. Noble  
General Counsel

Date

8/28/89

BY:

  
Lois G. Lerner  
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

TO: LAWRENCE M. NOBLE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/DELORES R. HARRIS *DRH*  
SECRETARY OF THE COMMISSION  
DATE: AUGUST 31, 1989  
SUBJECT: MURS 2899, 2901, 2843  
FIRST GENERAL COUNSEL'S REPORT  
DATED AUGUST 29, 1989

The above-captioned matter was received in the  
Commission Secretariat at 3:48 P.M. on August 29, 1989  
and circulated on a 24-hour no-objection basis at  
11:00 A.M. on August 30, 1989.

There were no objections to the above-captioned  
matter.

90040812385



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
OCT 27 PM 12:16

**SENSITIVE**

October 27, 1989

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner *LL*  
Associate General Counsel

SUBJECT: MURs 2843, 2899, 2900 and 2901  
Waivers of Confidentiality

The Office of the General Counsel received requests for a waiver of the Act's confidentiality provision from Congressman Richard K. Armey, Susan Armey, O.F. Henning, Jr., Dick Armey Campaign and Mike F. Keeling, as treasurer, and Policy Innovation Political Action Committee and Susan Armey, as treasurer.

Title 2 U.S.C. § 437g(a)(12)(A) provides that any notification or investigation shall not be made public by the Commission without the written consent of the person receiving such notification or the person with respect to whom such investigation is made. By its terms, section 437g(a)(12)(A) does not impose an affirmative duty on the Commission to publicize this matter at this time as it pertains to the above mentioned Respondents. Therefore this Office will respond to requests for information subject to the following considerations. First, requests must be in writing. Second, such requests would be considered by the Commission subject to the provisions of the Freedom of Information Act, the Government in the Sunshine Act, and all relevant privileges which would limit or preclude the release of such requested information.

RECOMMENDATION

1. Approve the attached letter.

Attachments

1. Waivers
2. Proposed Letter

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Waivers of Confidentiality ) MURS 2843, 2899,  
2900 and 2901

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 1, 1989, the Commission decided by a vote of 5-0 to approve the letter to Frank M. Northam, Esquire, as recommended in the General Counsel's Memorandum dated October 27, 1989.

Commissioners Aikens, Elliott, Josefiak, McGarry and Thomas voted affirmatively for the decision. Commissioner McDonald did not cast a vote.

Attest:

Nov 1, 1989  
Date

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

Received in the Secretariat: Friday, October 27, 1989 12:16  
Circulated to the Commission: Monday, October 30, 1989 11:00  
Deadline for vote: Wednesday, November 1, 1989 11:00

90040812387





FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

November 6, 1989

Frank M. Northam, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MURs 2843, 2899,  
2900 and 2901  
Congressman Richard K. Armey  
Susan Armey  
O.F. Henning, Jr.  
Dick Armey Campaign and Mike F.  
Keeling, as treasurer  
Policy Innovation Political  
Action Committee and Susan  
Armey, as treasurer

Dear Mr. Northam:

This is in response to your letters dated July 20, 1989, wherein your clients waive their right to confidentiality in the above-captioned matters, pursuant to 2 U.S.C. § 437g(a)(12)(A).

Your clients' waivers are hereby acknowledged by the Federal Election Commission; however, please note that these waivers pertain to information concerning your clients only. They do not pertain to any other respondents or issues in this matter. Thus, you or your clients may not disclose to any person any information pertaining to the other respondents or issues in this matter until you are notified by the Commission that the entire file in this matter is closed.

The Commission will consider requests for information concerning this matter subject to the following considerations. First, requests must be in writing. Second, such requests will be considered by the Commission subject to the provisions of the Freedom of Information Act, the Government in the Sunshine Act, and all relevant privileges which limit or preclude the release of such requested information.

20040812388

Frank M. Northam  
Page 2

If you have any questions, please contact Jonathan Bernstein,  
the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

20040313339

NOV 28 11:04

BEFORE THE FEDERAL ELECTION COMMISSION

SENATE

In the Matter of )  
 )  
Congressman Richard K. Armey )  
Susan Armey )  
O.F. Henning, Jr. )  
Will Radcliff )  
 )  
 )  
Don Hudspeth )  
Bill King )  
Robert Carrel )  
James Lightner )  
Donald E. Grimm )  
Alfred Allred )  
Jim Adams )  
Ernest Mahard )  
Arnold Petsche )  
Bill Bowen )  
David Fox )  
 )  
 )  
 )  
 )  
Dick Armey Campaign and )  
Mike Keeling, as treasurer )  
Policy Innovation Political )  
Action Committee and Susan )  
Armey, as treasurer )  
Right To Work Political )  
Action Committee and Reed )  
E. Larson, as treasurer )  
 )

MURs 2843 and  
2899, 2900, 2901

GENERAL COUNSEL'S REPORT

I. INTRODUCTION

90040312390

The complainant also alleges that the treasurer of the unauthorized committee filed three (3) reports late and also allowed persons other than herself to sign her name to the committee's reports. Lastly, the complainant claims that as a consequence of the alleged affiliation of the authorized and unauthorized committees, twelve (12) individuals and one multicandidate committee made excessive contributions to the two committees.

The complaint dealing with alleged late filing of reports overlaps too with MUR 2843, an internally generated matter based upon late filing of one of the reports listed in the complaint. Because of the overlap of respondents and allegations in the multiple complaints, and the overlap with an existing matter, the Office of the General Counsel recommends that the complaint generated matters that the Commission determines to pursue be merged together and that MUR 2843 be merged with the new matter.

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PAGES 3 THROUGH 12 DO NOT PERTAIN TO MURS 2843, 2899, 2900 AND 2901.

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**IV. MUR 2899 - Failure to Timely File Reports of Receipts and Disbursements**

In MUR 2899, the complainant alleges PIPAC and Susan Armey, as treasurer, failed to timely file three (3) reports of receipts and disbursements in the 1987-1988 election cycle. The alleged late filed reports were the 1988 July Quarterly, 12 Day Pre-General and 30 Day Post-General Reports. Pursuant to 2 U.S.C. § 434(a), the treasurers of political committees are required to file timely reports of receipts and disbursements.

The complainant alleges that PIPAC failed to file its 1988 July Quarterly Report in a timely manner. However, according to Commission records, the July Quarterly Report was filed timely on July 15, 1988. Therefore, this Office recommends the Commission find no reason to believe PIPAC violated 2 U.S.C. § 434(a)(4)(A)(i).

The complainant alleges that PIPAC failed to timely file its 1988 12 Day Pre-General Report. On October 3, 1988, PIPAC was notified that the 12 Day Pre-General Report was due on October 27, 1988, if contributions or expenditures were made in connection with the general election during the period of October 1 to October 19, 1988. On January 25, 1989, the Reports Analysis Division ("RAD") sent PIPAC a non-filer notice for the 12 Day Pre-General Report. On February 14, 1989, 110 days late, PIPAC filed the 1988 12 Day Pre-General Report disclosing twenty-two

contributions to federal candidates totaling \$18,500. In MUR 2843, the internally generated matter, the Commission has already made reason to believe findings based upon the late filing of the 12 Day Pre-General Report and Respondents have requested that further conciliation be postponed in order that these matters be treated together. See General Counsel's Report dated August 29, 1989. Therefore, this Office recommends the Commission merge MUR 2843 with this MUR.

Last, the complainant alleges that PIPAC failed to timely file its 1988 30 Day Post-General Report. Respondents contend that the 30 Day Post-General Report was timely filed on December 6, 1988, but Commission records disclose that the report was not filed until December 19, 1988. Therefore, this Office recommends that the Commission find reason to believe that Policy Innovation Political Action Committee and Susan Armey, as treasurer violated 2 U.S.C. § 434(a)(4)(A)(iii).

**V. MUR 2900 - Committee Reports not Signed by the Treasurer**

In MUR 2900, the complainant alleges that Susan Armey, as treasurer of PIPAC, permitted unauthorized persons to sign her name to PIPAC's FEC filings. In support of this allegation, the complainant submitted copies of five (5) of PIPAC's reports in order to show the difference in signature styles.

Pursuant to 2 U.S.C. § 434(a)(1), each treasurer of a

political committee shall sign each report of receipts and disbursements. Pursuant to 11 C.F.R. § 102.7(a), the treasurer of a political committee may designate, on the committee's Statement of Organization, an assistant treasurer who shall assume the duties and responsibilities of the treasurer in the event the treasurer is unavailable. Pursuant to 2 U.S.C. § 433(c), changes in information provided in the Statement of Organization must be reported within 10 days of the change.

On February 16, 1988, the Commission received a Statement of Organization from PIPAC signed by its treasurer, Susan Army. The Statement of Organization named the custodian of records as Huck Henning but did not disclose an assistant treasurer. If the signature on the original Statement of Organization is Susan Army's (see Attachment 6), the signatures on five of PIPAC's reports appear to be in different handwriting. The reports that appear to have a different signature than the Statement of Organization are the 1988 Amended July Quarterly, October Quarterly, 12 Day Pre-General, Amended 30 Day Post-General and the Year End Reports. In addition, the Amended 30 Day Post-General has the title "Assistant Treasurer" next to Mrs. Army's signature as if her name was in fact signed by the assistant treasurer. On March 24, 1989, the Commission received an amendment to PIPAC's 1988 Year End Report that was signed by Michael F. Keeling as the assistant treasurer. As previously mentioned, however, PIPAC has not notified the Commission of the existence of an assistant treasurer on its Statement of Organization.

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In its response, PIPAC admits that in at least one instance a person other than the treasurer signed the treasurer's name, but contends that, "Because Mrs. Arney exercised her 'best efforts' to submit the FEC reports as required, we do not believe that there has been any violation of law." Because this Office has found no applicable exception to 2 U.S.C. § 434(a)(1)'s plain requirement that the treasurer sign FEC reports, the Office of the General Counsel recommends the Commission find reason to believe that Policy Innovation Political Action Committee and Susan Arney, as treasurer violated 2 U.S.C. § 434(a)(1) and 2 U.S.C. § 433(c). This Office has prepared interrogatories to determine which reports were signed by persons other than the treasurer.

**VI. MUR 2901 - The Making of Excessive Contributions**

Finally, in MUR 2901, the complainant alleges that because PIPAC is an affiliated committee with the Dick Arney Campaign ("DAC"), the two committees share contribution limitations under 11 C.F.R. §§ 110.1(b)(1) and 110.2(b). Because of PIPAC's and DAC's shared contribution limitation of \$1,000 per election, complainant argues, the following Respondents made excessive contributions to PIPAC: Will Radcliff, David Fox, Bill Bowen, Arnold Petsche, Ernest Mahard, Jim Adams, Alfred Allred, Donald E. Grimm, James Lightner, Robert Carrel, Bill King, Don Hudspeth, and Right To Work Political Action Committee.

Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person may contribute more than \$1,000 per election to any authorized political committee. Under 2 U.S.C. § 441a(a)(1)(C), no person shall make a contribution to an unconnected political committee in

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any calendar year, which in aggregate exceeds \$5,000. Political committees are forbidden from knowingly accepting any contributions in excess of these limitations. 2 U.S.C. § 441a(f). PIPAC contends that it is independent of DAC and thus may accept contributions of \$5,000 per person in any calendar year. Consistent with our recommendation in MUR 2897, this Office agrees. It therefore appears that the following individuals made contributions to PIPAC within the limits of 2 U.S.C.

§ 441a(a)(1)(C):

<u>Name of Contributor</u>	<u>Date</u>	<u>Amount</u>
Jim Adams	3/8/88	\$500
" "	9/1/88	1,000
Alfred Allred	9/12/88	2,000
Bill Bowen	3/28/88	1,000
" "	8/30/88	4,000
Robert Carrel	4/5/88	2,000
" "	9/15/88	2,000
David Fox	8/30/88	2,000
Donald Grimm	3/8/88	1,000
" "	9/15/88	2,000
Don Hudspeth	9/9/88	2,000
Bill King	9/19/88	2,000
Ernest Mahard	8/30/88	2,000
Arnold Petsche	8/30/88	2,000
Will Radcliff	11/8/88	2,400

It appears that one individual, James Lightner, made three separate contributions of \$2,000 each to PIPAC on February 2, June 30, and September 15, 1988, totaling \$6,000, in violation of

2 U.S.C. § 441a(a)(1)(C). However, when PIPAC disclosed the September 15 contribution, the aggregate year-to-date total was reported as being \$5,000. Thus, PIPAC failed to accurately disclose the aggregate year-to-date total on its 1988 October Quarterly Report in violation of 11 C.F.R. § 104.3(a)(4)(i). In addition, on July 31, 1989, PIPAC amended its 1988 April and October Quarterly Reports to reattribute the February 2, 1988 contribution from James Lightner to his wife, Ida Lightner. Because this reattribution took place far beyond the sixty day window provided for in 11 C.F.R. § 110.1(k)(3)(ii)(B), the Office of the General Counsel recommends the Commission find reason to believe that PIPAC and Susan Arney, as treasurer, violated 2 U.S.C. § 441a(f) for the receipt of an excessive contribution from an individual, as well as 11 C.F.R. § 104.3(a)(4)(i). This Office also recommends that the Commission find reason to believe that James Lightner violated 2 U.S.C. § 441a(a)(1)(C). In addition, this Office recommends that the Commission find no reason to believe that the following individuals violated 2 U.S.C. § 441a(a)(1)(C): Jim Adams, Alfred Allred, Bill Bowen, Robert Carrel, David Fox, Donald Grimm, Don Hudspeth, Bill King, Ernest Mahard, Arnold Petsche, and Will Radcliff.

According to Commission records, Right To Work Political Action Committee ("RTW"), is a qualified multicandidate political committee and can therefore contribute up to \$5,000 per election to any authorized committee and may also contribute up to \$5,000 per calendar year to any unauthorized political committee.

2 U.S.C. § 441a(a)(2)(A), (2)(C). On July 9, and November 11,

1987, RTW contributed \$2,000 and \$2,500 respectively to DAC. In addition, on November 11 and 28, 1988, RTW contributed \$2,500 and \$2,000, respectively to PIPAC. RTW's contributions to both DAC and PIPAC were within the limitations of 2 U.S.C. § 441a. Therefore, this Office recommends that the Commission find no reason to believe that RTW and Reed E. Larson, as treasurer violated 2 U.S.C. §§ 441a(a)(2)(A) and 441a(a)(2)(C).

#### IV. RECOMMENDATIONS

##### C. MUR 2899

8. Find no reason to believe Policy Innovation Political Action Committee violated 2 U.S.C. § 434(a)(4)(A)(i).

9. Find reason to believe that Policy Innovation Political Action Committee and Susan Armey, as treasurer violated 2 U.S.C. § 434(a)(4)(A)(iii).

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D. MUR 2900

10. Find reason to believe that Policy Innovation Political Action Committee and Susan Armey, as treasurer violated 2 U.S.C. § 434(a)(1) and 2 U.S.C. § 433(c).

E. MUR 2901

11. Find reason to believe that PIPAC and Susan Armey, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.3(a)(4)(i).

12. Find reason to believe that James Lightner violated 2 U.S.C. § 441a(a)(1)(C).

13. Find no reason to believe that Jim Adams, Alfred Allred, Bill Bowen, Robert Carrel, David Fox, Donald Grimm, Don Hudspeth, Bill King, Ernest Mahard, Arnold Petsche, and Will Radcliff violated 2 U.S.C. § 441a(a)(1)(C), and close the file as to these individuals.

14. Find no reason to believe that Right to Work Political Action Committee and Reed E. Larson, as treasurer, violated 2 U.S.C. §§ 441a(a)(2)(A) and 441a(a)(2)(C), and close the file as to these respondents.

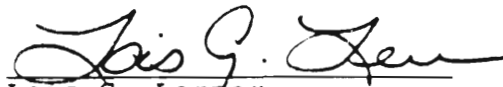
15. Merge MURS 2899 and 2900 with MUR 2901.

16. Merge MUR 2843 with MUR 2901.

17. Approve the attached letters, factual and legal analyses, and interrogatories.

Lawrence M. Noble  
General Counsel

11-27-89  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

Attachments

- 1.
- 2.
- 3.
4. Responses in MUR 2899
5. Responses in MUR 2900
6. PIPAC Statement of Organization
7. Responses in MUR 2901
8. Proposed notification letters
9. Factual and Legal Analyses
10. Interrogatories to PIPAC

Staff assigned: Bernstein/Kapper

00004031400



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS  
COMMISSION SECRETARY

DATE: DECEMBER 1, 1989

SUBJECT: MURS 2843, 2899, 2900 & 2901 -  
GENERAL COUNSEL'S REPORT DATED NOVEMBER 27,  
1989.

The above-captioned document was circulated to the  
Commission on Tuesday, November 28, 1989 at 4:00 p.m..

Objection(s) have been received from the Commissioner(s)  
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	XXXX
Commissioner McGarry	_____
Commissioner Thomas	XXXX

This matter will be placed on the meeting agenda  
for Tuesday, December 5, 1989 at 10:00 a.m..

Please notify us who will represent your Division before the  
Commission on this matter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

)  
Congressman Richard K. Armey; Susan )  
Armey; O.F. Henning, Jr.; Will Radcliff; )

)  
Don Hudspeth; Bill King; Robert Carrel; )  
James Lightner; Donald E. Grimm; )  
Alfred Allred; Jim Adams, Ernest Mahard; )  
Arnold Petsche; Bill Bowen; David Fox; )

MURs 2843 and  
2899, 2900,  
2901

)  
Dick Armey Campaign and Mike )  
Keeling, as treasurer; Policy Innovation )  
Political Action Committee and Susan )  
Armey, as treasurer; Right To Work )  
Political Action Committee and Reed )  
E. Larson, as treasurer. )

AMENDED CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal  
Election Commission executive session of December 5, 1989,  
do hereby certify that the Commission took the following  
actions in the above-captioned matter:

(continued)

20040312402

FEDERAL ELECTION COMMISSION  
AMENDED CERTIFICATION FOR  
MURs 2843, 2899,  
2900, 2901  
DECEMBER 5, 1989

PAGE 2

20040812403

2. Decided by a vote of 4-2 to approve  
the recommendations in the General  
Counsel's report dated November 27,  
1989 in MURS 2843, 2899,  
2900 and 2901 as follows:

(continued)



FEDERAL ELECTION COMMISSION  
AMENDED CERTIFICATION FOR MURs 2843,  
2899, 2900, 2901  
DECEMBER 5, 1989

PAGE 3

90040812404

C. MUR 2899

- 8) Find no reason to believe Policy Innovation Political Action Committee violated 2 U.S.C. § 434(a)(4)(A)(i).
- 9) Find reason to believe that Policy Innovation Political Action Committee and Susan Armey, as treasurer violated 2 U.S.C. § 434(a)(4)(A)(iii).

(continued)

FEDERAL ELECTION COMMISSION  
AMENDED CERTIFICATION FOR MURs 2843,  
2899, 2900, 2901  
DECEMBER 5, 1989

PAGE 4

D. MUR 2900

- 10) Find reason to believe that Policy Innovation Political Action Committee and Susan Army, as treasurer violated 2 U.S.C. § 434(a)(1) and 2 U.S.C. § 433 (c).

E. MUR 2901

- 11) Find reason to believe that PIPAC and Susan Army, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.3(a)(4)(i).
- 12) Find reason to believe that James Lightner violated 2 U.S.C. § 441a(a)(1)(C).
- 13) Find no reason to believe that Jim Adams, Alfred Allred, Bill Bowen, Robert Carrel, David Fox, Donald Grimm, Don Hudspeth, Bill King, Ernest Mahard, Arnold Petsche, and Will Radcliff violated 2 U.S.C. § 441a(a)(1)(C), and close the file as to these individuals.
- 14) Find no reason to believe that Right to Work Political Action Committee and Reed E. Larson, as treasurer, violated 2 U.S.C. §§ 441a(a)(2)(A) and 441a(a)(2)(C), and close the file as to these respondents.
- 15) Merge MURS 2899 and 2900 with MUR 2901.

(continued)

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FEDERAL ELECTION COMMISSION  
AMENDED CERTIFICATION FOR MURs 2843,  
2899, 2900, 2901

PAGE 5

- 16) Merge MUR 2843 with MUR 2901.
- 17) Approve the letters, factual and legal analyses, and interrogatories as recommended in the General Counsel's Report dated November 27, 1989.

Commissioners Aikens, Elliott, Josefiak and McGarry voted affirmatively for the decision; Commissioners McDonald and Thomas dissented.

Attest:

12/20/89  
Date

Hilda Arnold  
Hilda Arnold  
Administrative Assistant

9004031406



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 26, 1989

John G. Rebensdorf, Esquire  
1900 Thanksgiving Tower  
1601 Elm Street  
Dallas, TX 75201

RE: MUR 2901  
Alfred Allred

Dear Mr. Rebensdorf:

On June 21, 1989, the Federal Election Commission notified your client(s), Alfred Allred, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by your clients, that there is no reason to believe Alfred Allred violated 2 U.S.C. § 441a(a)(1)(C). Accordingly, the Commission closed its file in this matter as it pertains to your client.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*  
BY: Lois G. Lerner  
Associate General Counsel

90040312407



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1989

Frank R. Jelinek, Counsel  
801 E. Abram, Suite 102  
Arlington, TX 76010

RE: MUR 2901  
Arnold Petsche

Dear Mr. Jelinek:

On June 21, 1989, the Federal Election Commission notified your client, Arnold Petsche, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by your client, that there is no reason to believe your client violated 2 U.S.C. § 441a(a)(1)(C). Accordingly, the Commission closed its file in this matter as it pertains to your client.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*  
BY: Lois G. Lerner  
Associate General Counsel

20040312408



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1989

Ernest Mahard  
P.O. Box 248  
Prosper, TX 75078

RE: MUR 2901  
Ernest Mahard

Dear Mr. Mahard:

On June 21, 1989, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*  
BY: Lois G. Lerner  
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1989

Bill King  
B & D Enterprises  
15300 Midway Road  
Dallas, TX 75244

RE: MUR 2901  
Bill King

Dear Mr. King:

On June 21, 1989, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner", is written over the typed name of the Associate General Counsel.

BY: Lois G. Lerner  
Associate General Counsel

20040812410



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1989

Don Hudspeth  
P.O. Box 241  
Valley View, TX 76272-0241

RE: MUR 2901  
Don Hudspeth

Dear Mr. Hudspeth:

On June 21, 1989, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in cursive script, reading "Lois G. Lerner", is written over the typed name of the Associate General Counsel.

BY: Lois G. Lerner  
Associate General Counsel

90040812411





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1989

Donald Grimm  
5953 Club Oaks Drive  
Dallas, TX 75248

RE: MUR 2901  
Donald Grimm

Dear Mr. Grimm:

On June 21, 1989, the Federal Election Commission notified you, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner", is written over the typed name.

BY: Lois G. Lerner  
Associate General Counsel

20040812412



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1989

David Fox  
4208 Thanksgiving Tower  
1601 Elm Street, LB44  
Dallas, TX 75201-4752

RE: MUR 2901  
David Fox

Dear Mr. Fox:

On June 21, 1989, the Federal Election Commission notified you, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*

BY: Lois G. Lerner  
Associate General Counsel

20040812413



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 26, 1989

Bill Bowen  
Suite 900, Meadows Building  
Dallas, TX 75206

RE: MUR 2901  
Bill Bowen

Dear Mr. Bowen:

On June 21, 1989, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*

BY: Lois G. Lerner *ls gl*  
Associate General Counsel

90040812414



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1989

Robert Carrel  
5220 Briar Tree  
Dallas TX, 75248

RE: MUR 2901  
Robert Carrel

Dear Mr. Carrel:

On June 21, 1989, the Federal Election Commission notified you, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

440812415



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 26, 1989

Reed E. Larson, Treasurer  
Right To Work Political  
Action Committee  
5240 Port Royal Road, Suite 211  
Springfield, VA 22151

RE: MUR 2901  
Right To Work Political  
Action Committee and  
Reed E. Larson, as  
treasurer

Dear Mr. Larson:

On June 21, 1989, the Federal Election Commission notified the Right To Work Political Action Committee ("Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by the Committee, that there is no reason to believe the Committee and you, as treasurer violated 2 U.S.C. §§ 441a(a)(2)(A) and (C). Accordingly, the Commission closed its file in this matter as it pertains to the Committee and you, as treasurer.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner", is written over the typed name of the Associate General Counsel.

BY: Lois G. Lerner  
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1989

Mr. Jim Adams  
#3 Dromara Road  
St. Louis, MO 63124

RE: MUR 2901  
Jim Adams

Dear Mr. Adams

On June 21, 1989, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 5, 1989, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

90040312417



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1989

James Lightner  
5905 Steuben Court  
Dallas, TX 75248

RE: MUR 2901  
James Lightner

Dear Mr. Lightner:

On December 5, 1989, the Federal Election Commission notified you, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on December 5, 1989, found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Act. The 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. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable

90040812413

James Lightner  
Page 2

cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

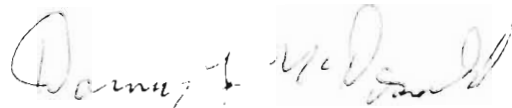
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Danny L. McDonald  
Chairman

Enclosures  
Designation of Counsel Form  
Factual & Legal Analysis

20040812412



FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: James Lightner

MUR: 2901

20040312420

The complainant alleges that Respondent James Lightner made excessive contributions to Policy Innovation Political Action Committee ("PIPAC"). Pursuant to 2 U.S.C. § 441a(a)(1)(C), no person shall make a contribution to an unconnected political committee in any calendar year, which in aggregate exceeds \$5,000. It appears that James Lightner made three separate contributions of \$2,000 each to PIPAC on February 2, June 30, and September 15, 1988, totaling \$6,000, in violation of 2 U.S.C. § 441a(a)(1)(C). Therefore, there is reason to believe that James Lightner violated 2 U.S.C. § 441a(a)(1)(C).



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

December 26, 1989

Frank M. Northam, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Suite 100  
Washington, D.C. 20006

RE: MUR 2901  
Policy Innovation Political  
Action Committee and Susan  
Armey, as treasurer

Dear Mr. Northam:

On June 21, 1989, the Federal Election Commission notified your clients, Policy Innovation Political Action Committee ("PIPAC") and Susan Armey, as treasurer, of complaints alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaints was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaints, and information supplied by your clients, on December 5, 1989, the Commission took the following action in these matters:

in MUR 2899, found that there is no reason to believe PIPAC violated 2 U.S.C. § 434(a)(4)(A)(i), and found reason to believe PIPAC and Susan Armey, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii); in MUR 2900, found reason to believe that PIPAC and Susan Armey, as treasurer, violated 2 U.S.C. §§ 433(c) and 434(a)(1); and in MUR 2901, found reason to believe that PIPAC and Susan Armey, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.3(a)(4)(i). On the same date, the Commission determined to merge MURs 2843, 2899 and 2900 with MUR 2901. Please use this number in all future correspondence regarding these matters.

With regard to MUR 2901, the Factual and Legal Analysis, which formed a basis for the Commission's reason to believe findings, 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 that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating 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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you have any questions, please contact Jonathan Bernstein, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Danny E. McDonald  
Chairman

Enclosures  
Questions  
Factual & Legal Analysis

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
)  
)  
)

MUR 2901

INTERROGATORIES

TO: Susan Arney, Treasurer  
c/o Frank Northam, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Suite 100  
Washington, D.C. 20006

With regard to the apparent different signatures on the reports of Policy Innovation Political Action Committee ("PIPAC") as filed with the Federal Election Commission, the Commission hereby requests that within 15 days of your receipt of this request, you submit answers in writing and under oath to the following questions:

1. Does PIPAC have an assistant treasurer? If so, please provide the individual's full name and the date on which he or she became designated as such.

2. Does PIPAC have a custodian of record? If so, please provide the individual's full name and the date on which he or she became designated as such.

3. Identify all individuals by full name, home address, and home and business telephone numbers who have signed your name to reports and other documents PIPAC has submitted to the Federal Election Commission. For each such individual, provide the coverage dates of the reports or dates of the documents that they signed. In addition, please identify each individual who authorized the signing of the reports by someone other than the treasurer of record.

90040813423

**FEDERAL ELECTION COMMISSION**

**FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS: Policy Innovation Political                      MUR 2901  
                  Action Committee and Susan Armye,  
                  as treasurer

**I. INTRODUCTION**

In several separate complaints, MURs 2899, 2900, and 2901, the complainant alleges that the treasurer of the unauthorized committee filed three (3) reports late; allowed persons other than herself to sign her name to the committee's reports; and accepted excessive contributions from individuals and a political committee.

**II. MUR 2899 - Failure to Timely File Reports of Receipts and Disbursements**

In MUR 2899, the complainant alleges PIPAC and Susan Armye, as treasurer, failed to timely file three (3) reports of receipts and disbursements in the 1987-1988 election cycle. The alleged late filed reports were the 1988 July Quarterly, 12 Day Pre-General and 30 Day Post-General Reports. Pursuant to 2 U.S.C. § 434(a), the treasurers of political committees are required to file timely reports of receipts and disbursements.

The complainant alleges that PIPAC failed to file its 1988 July Quarterly Report in a timely manner. However, according to Commission records, the July Quarterly Report was filed timely on July 15, 1988. Therefore, there is no reason to believe PIPAC violated 2 U.S.C. § 434(a)(4)(A)(i).

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The complainant alleges that PIPAC failed to timely file its 1988 12 Day Pre-General Report. On October 3, 1988, PIPAC was notified that the 12 Day Pre-General Report was due on October 27, 1988, if contributions or expenditures were made in connection with the general election during the period of October 1 to October 19, 1988. On January 25, 1989, the Reports Analysis Division ("RAD") sent PIPAC a non-filer notice for the 12 Day Pre-General Report. On February 14, 1989, 110 days late, PIPAC filed the 1988 12 Day Pre-General Report disclosing twenty-two contributions to federal candidates totaling \$18,500. In MUR 2843, an internally generated matter, the Commission has already made reason to believe findings based upon the late filing of the 12 Day Pre-General Report and Respondents have requested that further conciliation be postponed in order that these matters be treated together. Therefore, the Commission has merged MUR 2843 with this MUR.

Last, the complainant alleges that PIPAC failed to timely file its 1988 30 Day Post-General Report. Respondents contend that the 30 Day Post-General Report was timely filed on December 6, 1988, but Commission records disclose that the report was not filed until December 19, 1988. Therefore, there is reason to believe that Policy Innovation Political Action Committee and Susan Army, as treasurer violated 2 U.S.C. § 434(a)(4)(A)(iii).

**III. MUR 2900 - Committee Reports not Signed by the Treasurer**

In MUR 2900, the complainant alleges that Susan Army, as treasurer of PIPAC, permitted unauthorized persons to sign her name to PIPAC's FEC filings. In support of this allegation, the

complainant submitted copies of five (5) of PIPAC's reports in order to show the difference in signature styles.

Pursuant to 2 U.S.C. § 434(a)(1), each treasurer of a political committee shall sign each report of receipts and disbursements. Pursuant to 11 C.F.R. § 102.7(a), the treasurer of a political committee may designate, on the committee's Statement of Organization, an assistant treasurer who shall assume the duties and responsibilities of the treasurer in the event the treasurer is unavailable. Pursuant to 2 U.S.C. § 433(c), changes in information provided in the Statement of Organization must be reported within 10 days of the change.

On February 16, 1988, the Commission received a Statement of Organization from PIPAC signed by its treasurer, Susan Armey. The Statement of Organization named the custodian of records as Huck Henning but did not disclose an assistant treasurer. If the signature on the original Statement of Organization is Susan Armey's, the signatures on five of PIPAC's reports appear to be in different handwriting. The reports that appear to have a different signature than the Statement of Organization are the 1988 Amended July Quarterly, October Quarterly, 12 Day Pre-General, Amended 30 Day Post-General and the Year End Reports. In addition, the Amended 30 Day Post-General has the title "Assistant Treasurer" next to Mrs. Armey's signature as if her name was in fact signed by the assistant treasurer. On March 24, 1989, the Commission received an amendment to PIPAC's 1988 Year End Report that was signed by Michael F. Keeling as the assistant treasurer. As previously mentioned, however, PIPAC has not

notified the Commission of the existence of an assistant treasurer on its Statement of Organization.

In its response, PIPAC admits that in at least one instance a person other than the treasurer signed the treasurer's name, but contends that, "Because Mrs. Armey exercised her 'best efforts' to submit the FEC reports as required, we do not believe that there has been any violation of law." Because 2 U.S.C. § 434(a)(1) plainly requires that the treasurer sign FEC reports, there is reason to believe that Policy Innovation Political Action Committee and Susan Armey, as treasurer violated 2 U.S.C. § 434(a)(1) and 2 U.S.C. § 433(c).

#### IV. MUR 2901 - The Making of Excessive Contributions

Finally, in MUR 2901, the complainant alleges that because PIPAC is an affiliated committee with the Dick Armey Campaign ("DAC"), the two committees share contribution limitations under 11 C.F.R. §§ 110.1(b)(1) and 110.2(b). Because of PIPAC's and DAC's shared contribution limitation of \$1,000 per election, complainant argues, PIPAC accepted excessive contributions from Right To Work Political Action Committee and the following individuals: Will Radcliff, David Fox, Bill Bowen, Arnold Petsche, Ernest Mahard, Jim Adams, Alfred Allred, Donald E. Grimm, James Lightner, Robert Carrel, Bill King, and Don Hudspeth.

Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person may contribute more than \$1,000 per election to any authorized political committee. Under 2 U.S.C. § 441a(a)(1)(C), no person shall make a contribution to an unconnected political committee in any calendar year, which in aggregate exceeds \$5,000. A



qualified multicandidate political committee also may contribute up to \$5,000 per calendar year to any unauthorized political committee. 2 U.S.C. § 441a(a)(2)(C). Political committees are forbidden from knowingly accepting any contributions in excess of these limitations. 2 U.S.C. § 441a(f). PIPAC contends that it is independent of DAC and thus may accept contributions of \$5,000 per person in any calendar year. Consistent with the Commission's disposition of MUR 2897, it appears that the following individuals made contributions to PIPAC within the limits of 2 U.S.C.

§ 441a(a)(1)(C):

<u>Name of Contributor</u>	<u>Date</u>	<u>Amount</u>
Jim Adams	3/8/88	\$500
" "	9/1/88	1,000
Alfred Allred	9/12/88	2,000
Bill Bowen	3/28/88	1,000
" "	8/30/88	4,000
Robert Carrel	4/5/88	2,000
" "	9/15/88	2,000
David Fox	8/30/88	2,000
Donald Grimm	3/8/88	1,000
" "	9/15/88	2,000
Don Hudspeth	9/9/88	2,000
Bill King	9/19/88	2,000
Ernest Mahard	8/30/88	2,000
Arnold Petsche	8/30/88	2,000
Will Radcliff	11/8/88	2,400

According to Commission records, Right To Work Political Action Committee ("RTW"), is a qualified multicandidate committee and on

November 11 and 28, 1988, contributed \$2,500 and \$2,000, respectively to PIPAC, apparently within the limitation of 2 U.S.C. § 441a(a)(2)(C).

It appears that one individual, James Lightner, made three separate contributions of \$2,000 each to PIPAC on February 2, June 30, and September 15, 1988, totaling \$6,000, in violation of 2 U.S.C. § 441a(a)(1)(C). However, when PIPAC disclosed the September 15 contribution, the aggregate year-to-date total was reported as being \$5,000. Thus, PIPAC failed to accurately disclose the aggregate year-to-date total on its 1988 October Quarterly Report in violation of 11 C.F.R. § 104.3(a)(4)(i). In addition, on July 31, 1989, PIPAC amended its 1988 April and October Quarterly Reports to reattribute the February 2, 1988 contribution from James Lightner to his wife, Ida Lightner. Because this reattribution took place far beyond the sixty day window provided for in 11 C.F.R. § 110.1(k)(3)(ii)(B), there is reason to believe that PIPAC and Susan Armey, as treasurer, violated 2 U.S.C. § 441a(f) for the receipt of an excessive contribution from an individual, as well as 11 C.F.R. § 104.3(a)(4)(i).

The Commission also determined to merge MURs 2899 and 2900 with MUR 2901.

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN  
1747 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D. C. 20006

90 JAN -5 AM 9:59

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

(202) 785-9500  
FAX: (202) 835-0243

OF COUNSEL  
CHARLES E. CHAMBERLAIN  
CONSULTANT  
A. L. SINGLETON

January 4, 1990

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

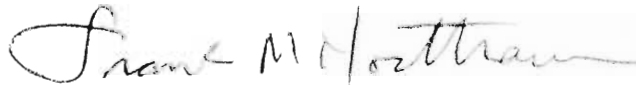
Re: Merged MUR 2901

Dear Jonathan:

The Commission's Interrogatories and Factual and Legal Analysis in MUR 2901 were received in my office on December 28, 1989 but I was out of the office and did not see them until January 2, 1990. I immediately sent copies to my clients but do not anticipate that I will have the requested responses within the 15 day deadline set by the Commission. Additionally, given the nature of the alleged violations that the Commission now intends to investigate, I am hopeful that my clients will authorize me to pursue pre-probable cause conciliation.

For these reasons, I request an extension of time to January 26, 1990 within which to respond to the Commission's requests.

Sincerely,



Frank M. Northam

FMN:dla

cc: Mrs. Susan Armey

Mr. Kerry A. Knott

90 JAN -5 AM 11:48

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

January 8, 1990

Frank M. Northam, Esq.  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2901


Dear Mr. Northam:

This is in response to your letter dated January 4, 1990, which we received on January 5, requesting an extension of time until January 26, 1990 to respond to the Commission's notification letter and Interrogatories. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on Friday, January 26, 1990.

If you have any questions, please contact Mr. Bernstein, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

90040312431

January 9, 1990

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OFFICE OF THE CLERK

Danny L. McDonald  
Chairman  
Federal Election Commission  
999 E. Street N.W.  
Washington, DC 20463

RE: MUR 2901  
James Lightner

Dear Sir:

In accordance with your letter dated December 26, 1989, three checks in the amount of \$2,000.00 each were sent to the Policy Innovation Political Action Committee ("PIPAC"). The first dated February 21, 1988, the second June 27, 1988 and the third dated September 12, 1988. A copy of all three checks are enclosed. They were written on a joint account of James R. and Ida M. Lightner. The only signature appearing on the checks was that of James R. Lightner.

When we make contributions of this nature, it is always our intent to make one half the contribution from James R. and the other half from Ida M. Therefore in 1988 James R. and Ida M. Lightner each gave "PIPAC" a contribution of \$3,000.00 each.

In addition, we live in a community property state and have always believed that any wealth accumulated belonged to each of us half and half, no matter which one of us were the recipient of the asset. We have also always believed that any contributions made were also given by each of us half and half no matter which one of us were the giver. Therefore, we believe our contributions to "PIPAC" in 1988 were not in violation to 2 U.S.C. §441a (a)(1)(C)

If additional information is needed to resolve this problem just let us know.

*Ida M. Lightner*  
Ida M. Lightner

*James R. Lightner*  
James R. Lightner

STATE OF TEXAS  
COUNTY OF DALLAS

This instrument was acknowledged before me on January 9, 1990 by James R. Lightner and Ida M. Lightner.

Lea Ann Bailey  
Notary Public

*Lea Ann Bailey*  
Signature of Notary Public

My Commission Expires: 2-17-92

2040432

CLARKE M



1717 Main Street  
Dallas, Texas 75201 290-2000



1717 Main Street  
Dallas, Texas 75201 290-2000

**JAMES R. OR IDA M. LIGHTNER**

5905 STEUBEN CT. 380-1017  
DALLAS. TEXAS 75248

6276

PAY  
TO THE  
ORDER OF

PIDOC

11/22/22

\$220.00

742

Thailand and the

DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS

006276 0000614 0602676955

0000200000

**JAMES R. OR IDA M. LIGHTNER**

5905 STEUBEN CT. 380-1017

DALLAS, TEXAS 75248

6384

PAY  
TO THE  
ORDER OF

TIPAC



2000

14

Thailand and Co. 2227

DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS:

0602676955

0000 200000

9 0 0 4 0 8 1 2 4 3 3

90040812434

For Deposit Only

5300582

1005 34308

For deposit only

JAN 30 1980

PAY ANY BANK PER.  
AMERICAN BANK  
DALLAS, TEXAS

121041240

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS

Contribution

W. W. CARUTH, III, BUSINESS ACCOUNT

*Ja. M. Wright*

⑆004710⑆ ⑆111021596⑆ ⑆0803486⑆ ⑆0000050000⑆

7337

JAMES R. OR IDA M. LIGHTNER  
9406 STEUBEN CT. 980-1017  
DALLAS, TEXAS 75248

6069

*PEPAC* *10/58* *\$500.00*

PAY TO THE ORDER OF *The Insurance Co. of North America* DOLLARS

*James R. Lightner*

⑆006069⑆ ⑆111000614⑆ ⑆0602676955⑆ ⑆0000200000⑆

4031

*PEPAC* *5500582*

⑆006069⑆ ⑆111000614⑆ ⑆0602676955⑆ ⑆0000200000⑆



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FEDERAL ELECTION COMMISSION  
MAY 1961

90 JAN 29 AM 9:53

LAW OFFICES  
WEBSTER, CHAMBERLAIN & BEAN

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

**(202) 785-9500**

FAX: (202) 835-0243

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

OF COUNSEL  
CHARLES E. CHAMBERLAIN

CONSULTANT  
A. L. SINGLETON

90 JAN 29 PM 4: 16

RECEIVED  
FEDERAL ELECTION COMMISSION  
JAN 11 1967

January 26, 1990

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

Re: MUR 2901

Dear Jonathan:

I am enclosing Mrs. Armev's responses to the interrogatories propounded by the Commission in MUR 2901.

Given the nature of the violations that are alleged in MUR 2901 and the underlying facts, which demonstrate that if any violations occurred the violations were unintentional, I believe that it would be appropriate to explore pre-probable cause conciliation. I therefore request that the Office of General Counsel and the Commission authorize negotiations to conciliate MUR 2901 at this time.

Sincerely,

Francis M. Northrup

Frank M. Northam

FMN:dla  
Enclosure

cc: Mrs. Susan Armeay

Regarding MUR 2901, before the Federal Election Commission

The following are responses to the interrogatories requested of me regarding MUR 2901.

1. PIPAC does not have a designated assistant treasurer. I understand that Mike Keeling signed a report as Assistant Treasurer. There was discussion at one point about whether to add Mike Keeling as Assistant Treasurer, but it was decided against. I can only assume that Mike misunderstood this communication regarding the report that he signed.

2. PIPAC's custodian of record was originally Huck Henning, at 250 South Stemmons, 3rd Floor, Lewisville, Texas 75067. Mr. Henning was released as general consultant for PIPAC at the end of 1988. My husband, Congressman Dick Arme, has been in charge of the records since January 1, 1990.

3. In the cases where it was not practical for me to sign FEC reports, Huck Henning as PIPAC's general consultant, was told to sign my name and send them in. Mr. Henning has indicated that he simply had someone sign the documents in his place because he said he preferred a female's handwriting. I do not have any information as to the names of the signers. The information in each report was checked previously to verify the accuracy and authorization was given to sign my name simply due to practical considerations, i.e., when I was not available to sign the completed report. In each case I understood that I, as Treasurer, was responsible for the accuracy of the information and thus believed that my authorization for the signature would be deemed acceptable.

*Susan Arme*

Susan Arme  
Treasurer  
Policy Innovation PAC

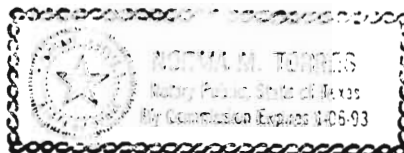
Sworn and subscribed before me this 25TH day of JANUARY, 1990.

Notary Public, *Norma M. Torres*

STATE OF TEXAS

NORMA M. TORRES

My commission expires the 6TH day of JANUARY, 1993.



06-5626

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 MAR -7 AM 9:20

LAW OFFICES  
**WEBSTER, CHAMBERLAIN & BEAN**  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006

(202) 785-9500

FAX: (202) 835-0243

OF COUNSEL  
CHARLES E. CHAMBERLAIN

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
EDWARD D. COLEMAN  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

March 6, 1990

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

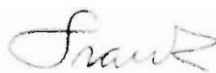
Re: MUR 2901

Dear Jonathan:

You have requested that PIPAC and Mrs. Armey identify the individuals, and their connection with PIPAC, who signed FEC reports on Mrs. Armey's behalf. Unfortunately, no one can presently recall the identities of those individuals other than that they were persons who performed volunteer work for PIPAC or who were employed by M-Group during the time that it was providing consulting services to PIPAC. M-Group was run by Huck Henning, who is referred to in Mrs. Armey's affidavit.

I am sorry that we cannot provide the information that you seek, but believe that pre-probable cause conciliation can proceed nevertheless.

Sincerely,



Frank M. Northam

FMN:dla

cc: Mrs. Susan Armey

90 MAR -7 AM 11:37

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MAIL ROOM

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 14, 1990

Frank M. Northam, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Suite 100  
Washington, D.C. 20006

RE: MUR 2901  
Policy Innovation Political  
Action Committee ("PIPAC"), and  
Susan Army, as treasurer

Dear Mr. Northam:

On January 29, 1990, the Commission received your response to its written questions in this matter. On February 12, 1990, we talked regarding the need for additional information in order to fully respond to the Commission's questions. On March 7, 1990, the Commission received your response which indicated no additional information was available.

This is to confirm that on March 14, 1990, we spoke again about your clients' answer to the Commission's questions. In order to provide a complete response as a predicate for entering into pre-probable cause conciliation, I asked that you submit a sworn statement by PIPAC's treasurer detailing which Reports of Receipts and Disbursements submitted to the Commission on behalf of PIPAC were signed by individuals other than the Treasurer. You agreed to provide such a statement right away.

Should you have any questions, please contact me or Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

A handwritten signature in cursive script, which appears to read "Jonathan Bernstein", is written over the typed name.

Jonathan Bernstein  
Assistant General Counsel

44312439

OGC 6068

LAW OFFICES  
**WEBSTER, CHAMBERLAIN & BEAN**  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006  
(202) 785-9500  
FAX: (202) 835-0243

90 APR 30 PM 12:26

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
EDWARD D. COLEMAN  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

OF COUNSEL  
CHARLES E. CHAMBERLAIN

April 27, 1990

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 APR 30 PM 3:12

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

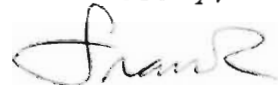
Re: MUR 2901; Policy Innovation  
Political Action Committee  
("PIPAC") and Susan Army,  
as Tresurer

Dear Jonathan:

In connection with MUR 2901, you have requested a sworn statement concerning which FEC reports by PIPAC were not actually signed by PIPAC's treasurer. I am enclosing a sworn statement from Mrs. Susan Army that provides you with that information.

If you need anything further, please let me know.

Sincerely,



Frank M. Northam

FMN:dla  
Enclosure

cc: Mrs. Susan Army

90040812440

Statement by Susan Armeý regarding MUR 2901

In regard to the signatures on PIPAC's FEC reports, someone other than myself signed the following reports:

- Thirtieth day report following the general election on 11/8/88.
- Twelfth day report preceding the general election on 11/8/88.
- October 15, 1988 Quarterly report
- July 15, 1988 Quarterly report

In each of these cases, Huck Henning, PIPAC's consultant at the time, was authorized to sign the reports in my absence. I am not certain if Huck himself signed the reports or if an employee of his company (M-Group), or perhaps a volunteer, signed it under his instruction. In these cases, I was unable to sign them due to time constraints or when I was traveling and unable to sign the report before the due date. I understood, however, that as Treasurer I was responsible for the report--which had been reviewed--even though someone else signed my name.

*Susan Armeý*

Susan Armeý  
Treasurer  
PIPAC

*Signed before me on 4-11-90*  
*Deborah A. Allen*

DEBORAH A. ALLEN  
NOTARY PUBLIC STATE OF TEXAS  
COMMISSION EXPIRES 2-09-91

90040312441

90 MAY 11 AM 11:57

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of )  
 )  
 Policy Innovation Political )  
 Action Committee and Susan ) MUR 2901  
 Army, as treasurer )  
 James R. Lightner )  
 )

COMPREHENSIVE INVESTIGATIVE REPORT NO. 1

I. PIPAC

On December 5, 1989, the Commission found reason to believe that Policy Innovation Political Action Committee ("PIPAC") and Susan Army, as treasurer violated 2 U.S.C. §§ 433(c), 434(a)(1), 434(a)(4)(A)(iii), 441a(f) and 11 C.F.R. § 104.3(a)(4)(i). On December 26, 1989, the Commission sent interrogatories to PIPAC that requested the identification of all the individuals that signed the treasurer's name to the disclosure reports and to identify which reports were signed by someone other than the treasurer of record. In addition, PIPAC was asked to identify each individual who authorized the signing of the reports by someone other than the treasurer.

On January 5, 1990, this Office received a request for an extension of time to respond to the interrogatories and granted an extension until January 26, 1990. On January 29, 1990, the Commission received PIPAC's response along with a request for pre-probable cause conciliation (Attachment 1). The response indicated that the treasurer authorized PIPAC's consultant, Huck Henning, to sign the disclosure reports and then submit them to the Commission. The response further stated that Mr. Henning had

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someone else sign the reports because, "he preferred a female's handwriting." The response failed to identify the individual(s) who actually signed the reports that were not signed by the treasurer of record. The response also failed to specify what reports were in fact signed by someone other than the treasurer.

On February 12, 1990, staff from this Office contacted counsel for the respondents and pointed out that the answers to the interrogatories were not fully responsive. Staff pointed out that full answers were necessary in regards to who signed the reports and which reports were not signed by the treasurer. On March 7, 1990, the Commission received a response from counsel stating that, "no one can presently recall the identities of those individuals...."(Attachment 2). On March 14, 1990, staff from this Office spoke with counsel again and pointed out that the treasurer at a minimum should be able to identify which reports she did not sign and that she should do so in a sworn statement immediately (Attachment 3).

Because we received no further response to the Commission's questions which had been outstanding since December 1989, this Office forwarded a report to the Commission on April 24, 1990, recommending that the Commission issue an Order to Answer Written Questions to respondents. Finally, on April 30, 1990, counsel submitted a notarized statement by PIPAC's treasurer listing the reports on which other persons signed her name (Attachment 4). On May 3, 1990, this Office withdrew its report, then scheduled for the May 8, 1990 Executive Session. We now appear to have sufficient information upon which to enter into conciliation, and

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a report recommending conciliation is now being prepared.

## II. James R. Lightner

On December 5, 1989, the Commission also found reason to believe that James R. Lightner violated 2 U.S.C. § 441a(a)(1)(C) by contributing a total of \$6,000 to PIPAC during calendar year 1988. Mr. Lightner and his spouse submitted a sworn response (Attachment 5) arguing that the PIPAC contributions were not excessive. They state that the three contributions of \$2,000 each were made by check drawn on a joint account; that the sole signator on the three checks was James R. Lightner; and that "[w]hen we make contributions of this nature, it is always our intent to make one half the contribution from James R. and the other half from Ida M." They also point out that Texas is a community property state and for this reason "[w]e have also always believed that any contributions made were also given by each of us half and half no matter which one of us were [sic] the giver."

Because all three contribution checks were signed only by James R. Lightner, under the Commission's regulations these contributions are attributable only to him and not to his spouse. 11 C.F.R. § 100.7(c); 11 C.F.R. § 110.1(k).<sup>1</sup> Accordingly, it

---

1. There is no indication that any of these contributions were reattributed within 60 days as permitted by 11 C.F.R. § 110.1(k)(3). In fact, from a telephone conversation between Mr. Lightner and staff of this Office, it appears that at no time have the Lightners signed a written reattribution of these contributions. PIPAC did report the reattribution of half of these contributions to Ida M. Lightner on July 31, 1989, 320 days after receipt of the last contribution, but as noted reattribution of contributions may be done only by written approval of the contributors.

appears Mr. Lightner did violate 2 U.S.C. § 441a(a)(1)(C). We have received no pre-probable cause conciliation request from this respondent. Thus, this Office will proceed to the next stage of the enforcement process with respect to him.

Lawrence M. Noble  
General Counsel

Date 5/10/90

BY:

  
Lois G. Lerner  
Associate General Counsel

Attachments

1. Response from PIPAC dated 1/26/89
2. Additional response from PIPAC dated 3/6/90
3. Letter to Counsel confirming conversation dated 3/14/90
4. Response from PIPAC dated 4/27/90
5. Response from Mr. Lightner dated 1/9/90

Staff Assigned: Tamara Kapper  
Jonathan Bernstein

90040812445



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DELORES HARRIS  
COMMISSION SECRETARY

DATE: MAY 15, 1990

SUBJECT: MUR 2901 - COMPREHENSIVE INVESTIGATIVE REPORT #1  
GENERAL COUNSEL'S REPORT DATED  
MAY 10, 1990.

The above-captioned document was circulated to the  
Commission on MONDAY, MAY 14, 1990 at 11:00 a.m..

Objection(s) have been received from the Commissioner(s)  
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	XXXX
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda  
for TUESDAY, MAY 22, 1990.

Please notify us who will represent your Division before the  
Commission on this matter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 2901  
Policy Innovation Political Action )  
Committee and Susan Armey, as )  
treasurer )  
James R. Lightner )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of May 22, 1990, do hereby certify that the Commission decided by a vote of 6-0 that with respect to respondent James. R. Lightner the Commission's finding of reason to believe in MUR 2901 should remain on the record, but that no other action should be taken with respect to this respondent.

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

Attest:

May 24, 1990  
Date

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

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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SECRETARIAT

90 MAY 31 PM 4:27

**SENSITIVE**

May 31, 1990

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner *LL*  
Associate General Counsel

SUBJECT: MUR 2901  
James R. Lightner

On May 22, 1990, the Commission determined that its finding of reason to believe against James R. Lightner should remain on the record, but that no other action should be taken with respect to this respondent. At that time, the Commission did not approve an appropriate letter to Mr. Lightner. Attached is a notification letter for the Commission's approval which notifies Mr. Lightner of the Commission's May 22 decision.

RECOMMENDATION

Approve the attached letter to James R. Lightner.

Attachment  
Proposed letter

Staff Assigned: Tamara Kapper

20040312443

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
James R. Lightner )

MUR 2901

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 5, 1990, the Commission decided by a vote of 5-0 to approve the letter to James R. Lightner, as recommended in the General Counsel's memorandum dated May 31, 1990.

Commissioners Aikens, Elliott, McDonald, McGarry and Thomas voted affirmatively for the decision; Commissioner Josefiak did not cast a vote.

Attest:

June 5, 1990  
Date

for Helka Arnold  
Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat:	Thurs., May 31, 1990	4:27 p.m.
Circulated to the Commission:	Fri., June 1, 1990	12:00 p.m.
Deadline for vote:	Tues., June 5, 1990	4:00 p.m.

dr

20040812442



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1990

James R. Lightner  
5905 Steuben Court  
Dallas, TX 75248

RE: MUR 2901  
James R. Lightner

Dear Mr. Lightner:

On December 26, 1989, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). On January 9, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on May 22, 1990 that its finding of reason to believe should remain on the record, but that no other action would be taken with respect to you. Therefore, the Commission closed its file in this matter as it pertains to you.


The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that under its regulations contribution checks signed only by you are contributions from you and not from your spouse. Therefore, your 1988 contributions to Policy Innovation Political Action Committee aggregating \$6,000 appear to be a violation of 2 U.S.C. § 441a(a)(1)(C). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

20040312450

90 AUG 28 AM 11:30

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
 Policy Innovation Political )  
 Action Committee and Susan ) MUR 2901  
 Army, as treasurer )  
 )

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On April 3, 1989, the Commission found reason to believe that Policy Innovation Political Action Committee and Susan Army, as treasurer ("PIPAC"), violated 2 U.S.C. § 434(a)(4)(A)(ii). This finding was based on a referral from the Reports Analysis Division ("RAD"). In addition, on December 5, 1989, the Commission also found reason to believe that PIPAC violated 2 U.S.C. §§ 433(c), 434(a)(1), 434(a)(4)(A)(iii), 441a(f) and 11 C.F.R. § 104.3(a)(4)(i). These findings were based on five (5) external complaints filed with the Commission by John Wayne Caton.<sup>1</sup> Also on December 5, 1989, the Commission determined to merge these four matters.

On April 30, 1990 counsel for the respondents submitted a response in this matter.<sup>2</sup> We now appear to have sufficient information to enter into conciliation.

1. On December 5, 1989 the Commission determined to find no reason to believe in MURs 2897 and 2898 and closed the files in relation to those matters. The files in this matter were made public on January 25, 1990.

2. Receipt of this response lead this Office to withdraw from the May 8, 1990 agenda, a General Counsel's Report recommending approval of an Order to Answer Questions.

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II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

This Office recommends that the Commission enter into conciliation with the respondents prior to a finding of probable cause to believe.

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IV. RECOMMENDATIONS


1. Enter into conciliation with Policy Innovation Political Action Committee and Susan Armey, as treasurer ("PIPAC") prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement.
3. Approve the appropriate letter.

Lawrence M. Noble  
General Counsel

Date

8/27/90

BY:

  
Lois G. Lerner  
Associate General Counsel

Attachment  
Proposed Conciliation Agreement

Staff Assigned: Tamara Kapper

90040812454

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Policy Innovation Political ) MUR 2901  
Action Committee and Susan )  
Armey, as treasurer. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 30, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2901:

1. Enter into conciliation with Policy Innovation Political Action Committee and Susan Armey, as treasurer ("PIPAC") prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement, as recommended in the General Counsel's Report dated August 27, 1990.
3. Approve the letter, as recommended in the General Counsel's Report dated August 27, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, and McGarry voted affirmatively for the decision; Commissioner Thomas did not cast a vote.

Attest:

8-30-90

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Commission: Tues., August 28, 1990 11:30 a.m.  
Circulated to the Commission: Tues., August 28, 1990 4:00 p.m.  
Deadline for vote: Thurs., August 30, 1990 4:00 p.m.

dh

20040313455



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 6, 1990

Frank M. Northam, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2901  
Policy Innovation Political  
Action Committee and Susan  
Armey, as treasurer

Dear Mr. Northam:

On April 3, 1989, the Federal Election Commission found reason to believe that Policy Innovation Political Action Committee and Susan Armey, as treasurer ("PIPAC") violated 2 U.S.C. § 434(a)(4)(A)(ii). In addition, on December 5, 1989 the Commission also found reason to believe that your clients violated 2 U.S.C. §§ 433(c), 434(a)(1), 434(a)(4)(A)(iii), 441a(f), and 11 C.F.R. § 104.3(a)(4)(i). At your request, on August 30, 1990, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.


Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

Mr. Northam  
Page 2

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

90040312457



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 5, 1990

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Frank M. Northam, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2901  
Policy Innovation Political  
Action Committee and Susan  
Armey, as treasurer

Dear Mr. Northam:

On September 6, 1990, you were notified that, at your request, the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have not responded to the proposed agreement. The 30 day period for negotiations will soon expire. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature, likely of Lois G. Lerner, is written over the typed name of the Associate General Counsel.

BY: Lois G. Lerner  
Associate General Counsel

OCT 23 PM 4:12

## BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of )  
Policy Innovation Political ) MUR 2901  
Action Committee and )  
Susan Army, as treasurer )

## GENERAL COUNSEL'S REPORT

## I. BACKGROUND

On April 3, 1989, the Commission found reason to believe that Policy Innovation Political Action Committee and Susan Army, as treasurer ("PIPAC"), violated 2 U.S.C. § 434(a)(4)(A)(ii). In addition, on December 5, 1989, the Commission found reason to believe that PIPAC violated 2 U.S.C. §§ 433(c), 434(a)(1), 434(a)(4)(A)(iii), 441a(f), and 11 C.F.R. § 104.3(a)(4)(i). At the request of the respondents, on August 30, 1990, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.



## II. ANALYSIS

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The conciliation agreement approved by the Commission also requires that Respondents obtain in writing permission to reattribute the excessive contribution from James Lightner. The proposed letter to Respondents requests that they provide the Commission with a copy of the letter from Mr. Lightner within thirty (30) days of the date that the conciliation agreement becomes effective. Attachment 2 at 1.


## III. RECOMMENDATIONS

1. Accept the revised conciliation agreement with Policy Innovation Political Action Committee and Susan Armey, as treasurer. Attachment 1 at 3-7.
2. Approve the attached letter to Mr. Frank M. Northam. Attachment 2.

3. Close the file in this matter.
4. Approve the appropriate letters to notify the complainant and respondents that the entire matter has been closed.

Lawrence M. Noble  
General Counsel

Date 10/23/90

BY:   
Lois G. Lerner  
Associate General Counsel

Attachments

1. Letter, Signed Conciliation Agreement, and Civil Penalty Check
2. Proposed Letter to Frank M. Northam.

Staff Assigned: Tamara Kapper

90040012451



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / DELORES HARRIS *DH*  
COMMISSION SECRETARY

DATE: OCTOBER 26, 1990

SUBJECT: MUR 2901 - GENERAL COUNSEL'S REPORT  
DATED OCTOBER 23, 1990.

The above-captioned document was circulated to the  
Commission on WEDNESDAY, OCTOBER 24, 1990 at 11:00 a.m.

Objection(s) have been received from the Commissioner(s)  
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	<u>XXX</u>

This matter will be placed on the meeting agenda  
for WEDNESDAY, NOVEMBER 14, 1990.

Please notify us who will represent your Division before the  
Commission on this matter.

90040812462

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Policy Innovation Political ) MUR 2901  
Action Committee and )  
Susan Armey, as treasurer )

CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal Election Commission executive session of November 14, 1990, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2901:

1. Accept the revised conciliation agreement with Policy Innovation Political Action Committee and Susan Armey, as treasurer.
2. Approve the letter to Mr. Frank M. Northam, as recommended in the General Counsel's Report dated October 23, 1990.
3. Close the file in this matter.
4. Approve the appropriate letters to notify the complainant and respondents that the entire matter has been closed.

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

Attest:

11/15/90  
Date

Hilda Arnold  
Hilda Arnold  
Administrative Assistant

90040312463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1990

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

John Wayne Caton  
710 Midway Drive  
Euless, TX 76030

RE: MURs 2899, 2900 & 2901

Dear Mr. Caton:

This is in reference to the complaints you filed with the Federal Election Commission on June 13, 1989, which were designated MURs 2897, 2898, 2899, 2900 and 2901. You were previously notified of the final disposition of MURs 2897 and 2898.

On December 5, 1989, the Commission reviewed the allegations of your complaints as well as information provided by the respondents. The Commission found that there was reason to believe in MUR 2899 that Policy Innovation Political Action Committee and Susan Arney, as treasurer ("PIPAC"), violated 2 U.S.C. § 434(a)(4)(A)(iii) but the Commission found no reason to believe that PIPAC violated 2 U.S.C. § 434(a)(4)(A)(i). On that same date, the Commission found reason to believe in MUR 2900 that PIPAC violated 2 U.S.C. §§ 433(c) and 434(a)(1).

On December 5, 1989, the Commission also found reason to believe in MUR 2901 that PIPAC violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.3(a)(4)(i), and that James Lightner violated 2 U.S.C. § 441a(a)(1)(C). In addition, the Commission found no reason to believe that Jim Adams, Alfred Allred, Bill Bowen, Robert Carrel, David Fox, Donald Grimm, Don Hudspeth, Bill King, Ernest Mahard, Arnold Petsche, and Will Radcliff violated 2 U.S.C. § 441a(a)(1)(C) and found no reason to believe that Right to Work Political Action Committee and Reed E. Larson, as treasurer, violated 2 U.S.C. §§ 441a(a)(2)(A) and (C). On December 5, 1989 the Commission also determined to merge MURs 2899 and 2900 with MUR 2901.

John Wayne Caton  
Page 2

Thereafter, on May 22, 1990 the Commission determined to take no further action in regard to Mr. Lightner. A Statement of Reasons reflecting the basis for the Commission's disposition as to Mr. Lightner is attached.

Finally, on November 14, 1990, a conciliation agreement signed by the remaining respondents, PIPAC and Susan Armey, as treasurer, was accepted by the Commission. Accordingly, the Commission closed the file in this matter on that same date. A copy of this agreement is enclosed for your information.

This matter will become part of public record within 30 days. The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

Enclosures  
Statement of Reasons  
Conciliation Agreement

9004031:465

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

James R. Lightner

MUR 2901

STATEMENT OF REASONS

On December 5, 1989, the Commission found reason to believe that James R. Lightner violated 2 U.S.C. § 441a(a)(1)(C) by contributing a total of \$6,000 to Policy Innovation Political Action Committee during calendar year 1988. Three contributions of \$2000 each were made to the Committee by checks drawn on a joint account of Mr. Lightner and his wife, but were signed only by Mr. Lightner. Under the Commission's regulations, therefore, these contributions were attributable only to him and not his spouse. 11 C.F.R. § 100.7(c); 11 C.F.R. § 110.1(k).

Mr. Lightner and his wife submitted a sworn response stating that they intended the contributions drawn on their joint account to be attributed half to Mr. Lightner and half to Mrs. Lightner. They also asserted that this result was consistent with their customary practice and their understanding of Texas community property law. In view of their stated intentions and the amount of contributions involved, and considering the proper ordering of Commission priorities and resources, see Heckler v. Chaney, 470 U.S. 821 (1985), the Commission determined on May 22, 1990, that its finding of reason to believe against James R. Lightner should remain on the record, but that no other action should be taken with respect to this respondent.

Statement of Reasons  
MUR 2901  
Page 2

6/27/90  
Date

Lee Ann Elliott  
Lee Ann Elliott  
Chairman

6/27/90  
Date

John Warren McGarry  
John Warren McGarry  
Vice Chairman

6/28/90  
Date

Joan D. Aikens  
Joan D. Aikens  
Commissioner

6/27/90  
Date

Thomas J. Josefiak  
Thomas J. Josefiak  
Commissioner

6/27/90  
Date

Danny L. McDonald  
Danny L. McDonald  
Commissioner

6/28/90  
Date

Scott E. Thomas  
Scott E. Thomas  
Commissioner

90040312467





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 21, 1990

Robert L. Schwartz, Esquire  
906 Main Street, Suite 405  
Cincinnati, OH 45202

RE: MUR 2901  
Will Radcliff

Dear Mr. Schwartz:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to read "L92", is written over the typed name of Lois G. Lerner.

BY: Lois G. Lerner  
Associate General Counsel

92040812468



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1990

John G. Rebensdorf, Esquire  
1900 Thanksgiving Tower  
1601 Elm Street  
Dallas, TX 75201

RE: MUR 2901  
Alfred Allred


Dear Mr. Allred:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

9004081:459



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 21, 1990

Ernest Mahard  
P.O. Box 248  
Prosper, TX 75078

RE: MUR 2901  
Ernest Mahard


Dear Mr. Mahard:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

93040313470



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 21, 1990

James R. Lightner  
5905 Steuben Court  
Dallas, TX 75248

RE: MUR 2901  
James R. Lightner


Dear Mr. Lightner:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

90040812471



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

November 21, 1990

Bill King  
B & D Enterprises  
15300 Midway Road  
Dallas, TX 75244

RE: MUR 2901  
Bill King

Dear Mr. King:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to read "Lois G. Lerner", is written over a horizontal line.

BY: Lois G. Lerner  
Associate General Counsel

90040312472



## FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

November 21, 1990

Frank R. Jelinek, Esquire  
801 E. Abram, Suite 102  
Arlington, TX 76010

RE: MUR 2901  
Arnold Petsche

Dear Mr. Jelinek:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

November 21, 1990

Don Hudspeth  
P.O. Box 241  
Valley View, TX 76272-0241

RE: MUR 2901  
Don Hudspeth


Dear Mr. Hudspeth:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

90040312474



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1990

Donald Grimm  
5953 Club Oaks Drive  
Dallas, TX 75248

RE: MUR 2901  
Donald Grimm

Dear Mr. Grimm:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to be "L. Lerner", is written over the typed name of Lois G. Lerner.

BY: Lois G. Lerner  
Associate General Counsel

90040812475





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 21, 1990

David Fox  
4208 Thanksgiving Tower  
1601 Elm Street, LB44  
Dallas, TX 75201-4752

RE: MUR 2901  
David Fox

Dear Mr. Fox:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to read "L. G. Lerner", is written over the typed name of the Associate General Counsel.

BY: Lois G. Lerner  
Associate General Counsel

90040313476



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1990

Robert Carrel  
5220 Briar Tree  
Dallas, TX 75248

RE: MUR 2901  
Robert Carrel

Dear Mr. Carrel:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to read "L. G. Lerner", is written over the typed name of the Associate General Counsel.

BY: Lois G. Lerner  
Associate General Counsel

92040812477



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 21, 1990

Bill Bowen  
Suite 900, Meadows Building  
Dallas, TX 75206

RE: MUR 2901  
Bill Bowen

Dear Mr. Bowen:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to read "LGL", is written over the typed name of Lois G. Lerner.

BY: Lois G. Lerner  
Associate General Counsel

90040812478



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1990

Jim Adams  
#3 Dromara Road  
St. Louis, MO 63124

RE: MUR 2901  
Jim Adams

Dear Mr. Adams:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to be "L. Lerner", is written over the typed name of Lois G. Lerner.

BY: Lois G. Lerner  
Associate General Counsel

90040312479



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 21, 1990

Reed E. Larson, Treasurer  
Right To Work Political  
Action Committee  
5240 Port Royal Road, Suite 211  
Springfield, VA 22151

RE: MUR 2901  
Right To Work Political  
Action Committee and  
Reed E. Larson, as  
treasurer

Dear Mr. Larson:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to read "L. Lerner", is written over a horizontal line.

BY: Lois G. Lerner  
Associate General Counsel

90040812430



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1990

**CLOSED**

Frank M. Northam, Esquire  
Webster, Chamberlain & Bean  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

RE: MUR 2901  
Policy Innovation Political  
Action Committee and Susan  
Armey, as treasurer

Dear Mr. Northam:

On November 14, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 433(c), 434(a)(4)(A)(ii) and (iii), 434(a)(1), 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 104.3(a)(4)(A)(i). Accordingly, the entire file has been closed in this matter. Enclosed you will find a copy of the fully executed conciliation agreement for your files.

As you will recall, paragraph VI, section 1, of the conciliation agreement requires that respondents obtain, in writing, permission to reattribute the excessive contribution from James Lightner. Please provide the Commission with a copy of the reattribution letter within the thirty day time period specified in the conciliation agreement.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Frank M. Northam, Esq.  
Page 2

If you have any questions, please contact Tamara Kapper,  
the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

90040812432

93040313433

In the Matter of )  
 )  
Policy Innovation Political )  
Action Committee and )  
Susan Armey, as treasurer ) MUR 2901  
 )

## CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. In addition, five (5) signed, sworn, and notarized complaints were filed by John Wayne Caton. The Commission found reason to believe that Policy Innovation Political Action Committee and Susan Arney, as treasurer ("Respondents") violated 2 U.S.C. §§ 433(c), 434(a)(1), 434(a)(4)(A)(ii) and (iii), 441a(f) and 11 C.F.R. § 104.3(a)(4)(i).

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. § 437q(a)(4)(A)(i).

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

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



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

1. Policy Innovation Political Action Committee ("PIPAC"), is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Susan Armev is the treasurer of PIPAC.

3. Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), Respondents were required to file the 1988 12 Day Pre-General Report on October 27, 1988. Respondents failed to file this report until February 14, 1989, 110 days late, disclosing \$13,820 in receipts and \$26,020 in disbursements.

4. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), Respondents were required to file the 1988 30 Day Post-General Report on December 8, 1988. Respondents failed to file this report until December 19, 1988, 11 days late, disclosing \$10,589 in receipts and \$7,435 in disbursements.

5. Pursuant to 2 U.S.C. § 434(a)(1), the treasurer of a political committee shall sign each report of receipts and disbursements. Respondent treasurer failed to sign the 1988 July and October Quarterly Reports and the 1988 12 Pre-General and 30 Day Post-General Reports. Instead, other persons who the respondent treasurer is unable to identify signed the treasurer's name to these reports.

6. Pursuant to 2 U.S.C. § 433(c), changes in information provided in the Statement of Organization must be reported within 10 days of the change. On March 24, 1989, the Commission received an amendment to PIPAC's 1988 Year End Report that was signed by Michael F. Keeling as the assistant treasurer.

900401:434

Respondents failed to notify the Commission of an assistant treasurer by amending the Statement of Organization within 10 days of the change.

7. Pursuant to 2 U.S.C. § 441a(a)(1)(C), no person shall make a contribution to an unconnected political committee in any calendar year, which in aggregate exceeds \$5,000. In addition, 2 U.S.C. § 441a(f) forbids political committees from knowingly accepting any contributions in excess of this limitation. On February 2, 1988, PIPAC received a \$2,000 contribution from James Lightner. On June 30, 1988, PIPAC received another \$2,000 contribution from Mr. Lightner. Then on September 15, 1988, PIPAC received another \$2,000 contribution from Mr. Lightner for a total of \$6,000.

8. Pursuant to 11 C.F.R. § 104.3(a)(4)(i), all unauthorized political committees are required to report the identification and aggregate year-to-date total for each contributor that contributes in excess of \$200 per calendar year to that political committee. Respondents disclosed in their 1988 October Quarterly Report that Mr. Lightner's September 15 contribution brought his aggregate year-to-date total to \$5,000, when in fact the contribution brought his aggregate year-to-date total to \$6,000.

V. 1. Respondents failed to file timely their 1988 12 Day Pre-General and 30 Day Post-General Reports in violation of 2 U.S.C. §§ 434(a)(4)(A)(ii) and (iii).

2. Respondents permitted persons other than the treasurer of record to sign the treasurer's name to four (4)

reports of receipts and disbursements filed with the Commission in violation of 2 U.S.C. § 434(a)(1).

3. Respondents appointed a new assistant treasurer without notifying the Commission of the change by amending the Statement of Organization within 10 days of the change in violation of 2 U.S.C. § 433(c).

4. Respondents accepted an excessive contribution in aggregate totaling \$1,000 from an individual in violation of 2 U.S.C. § 441a(f).

5. Respondents failed to accurately disclose the correct aggregate year-to-date contribution total for an individual in violation of 11 C.F.R. § 104.3(a)(4)(i).

VI. 1. Respondents will obtain in writing, permission to reattribute the excessive contribution from James Lightner.

2. Respondents will pay a civil penalty to the Federal Election Commission in the amount of three thousand dollars (\$3,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

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

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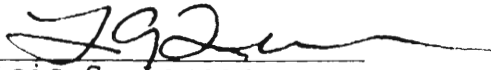
IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. 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 enforceable.

FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

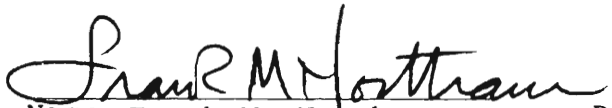
BY:

  
Lois G. Lerner  
Associate General Counsel

Date

11/20/90

FOR THE RESPONDENTS:

  
Name Frank M. Northam  
Attorney for Respondents

Date

October 2, 1990

20040312437



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 2901

DATE FILMED \_\_\_\_\_ CAMERA NO. 2

CAMERAMAN AS

92040812433



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D C 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2901.

21540325462

06C 9000

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICES  
**WEBSTER, CHAMBERLAIN & BEAN**  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006  
(202) 785-9500  
FAX: (202) 835-0243

90 DEC 17 AM 9:56

GEORGE D. WEBSTER  
J. COLEMAN BEAN  
ARTHUR L. HEROLD  
ALAN P. DYE  
BURKETT VAN KIRK  
FRANK M. NORTHAM  
GERARD P. PANARO  
JOHN W. HAZARD, JR.  
CHARLES M. WATKINS  
ROBERT M. SKELTON  
HUGH K. WEBSTER  
ANNE B. POPE

**CLOSED**

OF COUNSEL  
CHARLES E. CHAMBERLAIN  
CONSULTANT  
A. J. SKELTON

December 13, 1990

Lois G. Lerner, Esq.  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W., 6th Floor  
Washington, D.C. 20463

Re: MUR 2901; Policy Innovation  
Political Action Committee and  
Susan Armey, as Treasurer

Dear Ms. Lerner:

In connection with the conciliation agreement entered into between the FEC and PIPAC in MUR 2901 and, specifically, with reference to section VI.1. of the agreement, please find enclosed a letter, signed by Mr. and Mrs. Lightner, directing PIPAC to reattribute a portion of the contributions made to PIPAC during 1988.

Upon your receipt of this letter, I believe that the Commission may close its file on MUR 2901.

Sincerely,

*Frank M. Northam*

Frank M. Northam

FMN:dla  
Enclosure

cc: Mrs. Susan Armey

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 DEC 17 PM 3:00

21040325453

November 26, 1990

Mrs. Susan Arney, Treasurer  
Policy Innovation Political  
Action Committee  
P.O. Box 426  
Lewisville, TX 75067

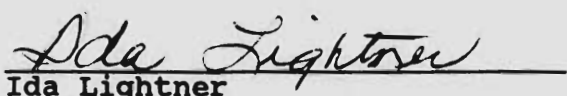
Dear Mrs. Arney:

During 1988, Policy Innovation Political Action Committee ("PIPAC") received contributions from me totalling \$6,000. Since this was \$1,000 in excess of the amount PIPAC could receive from me, you have requested permission to reattribute \$1,000 of the contributions as being contributions from my wife. My wife and I consent to reattributing \$1,000 as having been a contribution to PIPAC from my wife.

Sincerely,



James Lightner



Ida Lightner

21040325464