



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 3662

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN MC

93040992260

October 16, 1992

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

Dear Commissioners:

The Tarrant County Democratic Party files this complaint charging violations of the Federal Election Campaign Act of 1971, as amended ("FECA"), 2 U.S.C. §§ 431 et seq., and related regulations of the Federal Election Commission ("FEC"), 11 C.F.R. §§ 100.1 et seq., by David Hobbs, a candidate for the United States House of Representatives in the 12th Congressional District of Texas, and his principal campaign committee, the David Hobbs for Congress Committee ("the Committee") (referred to collectively hereafter as "Respondents").

Respondents have violated the FEC by failing to include proper identification notices on mailings attacking Mr. Hobbs' opponent and by accepting, but failing to report, contributions in-kind. The FEC should take all necessary steps to correct this situation, including, if necessary, an audit of the books and records of the Committee, to ensure that the activities of the Committee have been conducted in complete compliance with the FECA and FEC regulations and to ensure that the public record accurately reflects the activities of the Committee.

Evidence of Violations

1. Failure to Include Required Disclaimer. The FECA and the Commission's regulations require that any communication which advocates the election or defeat of a clearly identified candidate include a notice of who paid for the communication. 11 C.F.R. § 110.11. This requirement includes communications made by direct mail.

Attachment A to this Complaint is a mailing received by the public in the 12th Congressional District. The language of the mailing advocates the defeat of Congressman Pete Geren, and promotes the election of David Hobbs. The mailing contains no disclaimer or other notice to identify the party who paid for the mailing. From the contents of the mailing, it is apparent that the Committee was responsible for the production and distribution of the mailing. The failure to include the disclaimer is a violation of the campaign laws.

It may be that Mr. Hobbs did not wish to associate his campaign with the negative advertising containing in the mailing, but this is not an adequate reason for failing to comply with the

MUR 3662

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federal campaign laws. The laws were promulgated so that the public would be informed of the person responsible for communications such as this one. By allowing a campaign to willfully omit its name from such mudslinging, the FEC can only encourage further "inadvertent" mistakes of a similar nature.¹

2. Illegal In-Kind Contribution. The FECA defines the term "contribution" very broadly, including "anything of value." 2 U.S.C. § 431(8). The definition includes goods or services provided to a campaign at no charge. Such in-kind contributions must be valued at their fair market value, and must be reported by the campaign on its FEC disclosure reports.

Attachment B to this Complaint is the copy of a letter sent by Congressman Dick Armey on behalf of Mr. Hobbs and the Committee. The letter advocates Mr. Hobbs' election and solicits support for his campaign. It was distributed by mail to Congressman Armey's contributors in Texas and, apparently, nationwide. The costs involved in such a mailing are not small, involving production costs, printing costs, and postage. The value of the mailing list used is in addition to these costs.

A review of Mr. Hobbs' FEC reports for the period when the mailing was made reveals no in-kind contribution from Congressman Armey's campaign. Nor is there any report of a reimbursement for a mailing from Mr. Hobbs to Congressman Armey's campaign. It would appear that Mr. Hobbs received the benefit of the costs of the mailing by Mr. Armey, but failed to report it as a contribution in-kind. Further, given the normal cost of such a mailing, it would appear that the contribution in-kind by Congressman Armey exceeded the contribution limits.

The mailing contains a disclaimer that Congressman Armey's campaign committee paid for the mailing. Because the FEC has taken the position that the principal campaign of a candidate cannot make independent expenditures on behalf of another candidate, the disclaimer fails to state that it was authorized

¹Attachment C to this Complaint shows that Mr. Hobbs' campaign is aware of the disclaimer requirements, since this mailing, positive in tone, contains an FEC disclaimer.

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by Mr. Hobbs' campaign, a further violation of the disclaimer provisions of the FECA.²

Conclusion

On the basis of the foregoing, the Tarrant County Democratic Party asks that the FEC:

- Conduct an immediate investigation, including, as necessary, an audit, of the facts stated in this Complaint;
- Enter into prompt conciliation with Respondents to remedy the violations set forth in this Complaint and, more importantly, to ensure that no further violations occur; and
- Impose any and all penalties grounded in the violations set forth in this Complaint.

Very truly yours,

Evelyn G. Farmer

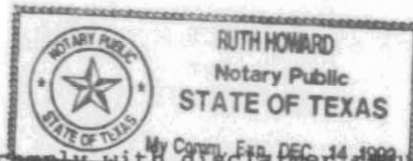
Evelyn Farmer
Chairwoman, Tarrant County
Democratic Party

Subscribed and sworn to before me
this 19 day of October, 1992.

Ruth Howard

Notary Public
My Commission expires:

Dec. 14, 1992



²Mr. Hobbs' failure to comply with disclaimer requirements is not limited to the FECA. Although it is not within the FEC's jurisdiction, Attachment C to this Complaint reveals that Mr. Hobbs has also violated the disclaimer provisions of the Internal Revenue Code. The letter solicits contributions for Mr. Hobbs' campaign, but fails to inform the reader that contributions to his committee are not deductible for federal income tax purposes.

93040992263

COMPLAINANT: Mrs. Evelyn Parmer
Chairwoman
Tarrant County Democratic Party
1209 Lake Street
Fort Worth, Texas 76102

93040992264

*"No one is above the law.
But some of our Congressmen
don't know that.
It's time to 'clean House'
in Washington."*

-- David Hobbs

Reform Congress

- Term Limits
- Stop illegal congressional mailings
- Cut Congress' budget; eliminate unnecessary staff & committees
- Full investigation of congressional corruption
- Audit Congress by independent accountants
- Curtail perks & privileges

Congress serves itself -- not you!



Change Congress. Now!

David Hobbs

U.S. Congress

Post Office Box 821251
Fort Worth, Texas 76182

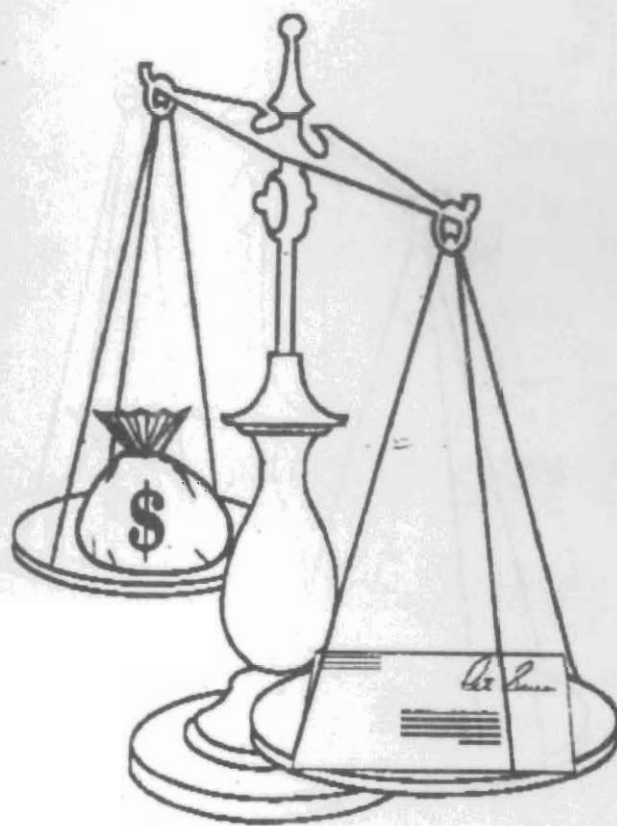
Bulk Rate
U.S. Postage
PAID
Permit #1249
Fort Worth, TX

UNLIKE
Incumbent Pete Geren's mail
this was
NOT
paid for at
taxpayer expense.

CAR-RT SORT 00CR34
UNCAN
NT
L #C
TX 76116

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**A
Federal Court
Can't Stop
Pete Geren
From
Breaking The Law**



But You Can.

93040992266

Is campaigning for re-election using our tax dollars. And that's illegal.

U.S. Court of Appeals calls it unconstitutional

- On July 30, 1992, a federal court ruled it was "unconstitutional" for incumbent congressmen to send mass mailings (at taxpayer expense) to voters who live outside their current districts.

Congress made it illegal

- Later on the same day, the U.S. Congress made these mailings "illegal," and instructed congressmen to stop sending mailings outside their current districts.

Geren defies the court and Congress itself.

- In late August, Congressman Pete Geren sent several mass mailings -- all paid for by the taxpayers -- to persons who live outside his current district.
- Geren's illegal mailings may have cost the taxpayers tens of thousands of dollars.

"Why are some representatives abusing that privilege to mail outside their existing districts? Simply to increase their name recognition for the upcoming election."

Joe Barton

Guest Editorial for the
Fort Worth Star-Telegram
April 30, 1992

Pete Geren blames the Post Office . . .

. . . David Hobbs says that's "baloney."

Please read the testimony on the next page.

You decide.



The Ruling of the Court

On July 30, 1992, ruling, one of the judges in the case said that congressional mailings outside of current district are no different from giving every incumbent \$100,000 to hold campaign rallies in the new area . . . government funding of [this] promotes the incumbent's re-election, without enhancing his capacity to serve his constituents, and is therefore impermissible..."



"I live in one of the areas that the court said Geren can't send his 'congressional' mail. Yet I got his illegal mailings. Geren is the kind of self-serving politician we don't need in Washington."

-- Margaret Russey

"When we found out that all of the mail we've been getting from Pete Geren is illegal since we live outside his current district, we got mad. Why do these politicians waste so much of our money talking about nothing but themselves?"

-- The Greg Kelly Family



"Why is Geren charging the taxpayers for all this self-promotional mail? Joe Barton is my current congressman. And David Hobbs is going to be my new congressman. Pete Geren's illegal mail is proof that he's part of the problem in Washington."

-- Marjorie Nunn

Pete Geren broke the law.

From the above testimony, it's obvious folks who live outside Geren's current district have received his "congressional" mail -- at taxpayer expense. Geren is trying to promote his political career in the new areas where he is seeking reelection.

This mail was unsolicited, and many received

the mail in individually addressed envelopes, which means the Post Office did not "goof up," as Pete Geren would have us believe.

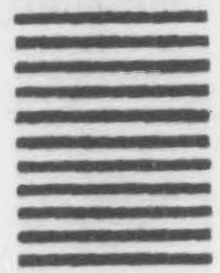
Geren intentionally sent illegal mail to voters in the new district, after a federal court ruled it unconstitutional and after Congress made such mail illegal.

**Your vote for David Hobbs will
stop Pete Geren from breaking the law.**

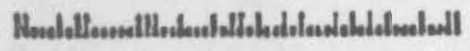


NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
First Class Permit No. 2565 Fort Worth, Texas 76182
POSTAGE WILL BE PAID BY ADDRESSEE



David Hobbs for Congress
P.O. Box 821251
Ft. Worth, TX 76182-9959



Yes, Pat, I want to join with you in supporting David Hobbs for Congress. The moral and economic problems we face can only be solved by electing conservative leaders like David. I am enclosing a contribution in the amount of:

___ \$25 ___ \$50 ___ \$100 ___ \$250 ___ \$500 ___ \$1,000 ___ Other \$ ___

The FEC requires that we ask the following information.

NAME _____ PHONE(H) _____
ADDRESS _____ PHONE(W) _____
CITY _____ STATE _____ ZIP _____
EMPLOYER _____ OCCUPATION _____

PLEASE MAKE CHECKS PAYABLE TO DAVID HOBBS FOR CONGRESS
Paid for by the David Hobbs for Congress Committee

6 9 2 2 6 9 0 9 0 2 6

*Don't
Doen be have
a chance?*



CONGRESSMAN DICK ARMEY

26TH DISTRICT OF TEXAS

November 14, 1991

Mr. Jere Thompson
2711 N. Haskell Avenue
Dallas, TX 75204

Dear Jere,

I'm writing because I hope you'll be able to do both me and yourself a favor.

Since first being elected to Congress, I've worked to restore some sanity to our federal government, to reduce government involvement in our lives and economy and to put the country back on track.

While I've had some successes, the most frustrating part about my job is that the liberal Democrat leadership is able to use its overwhelming majority to push through bad policies and to thwart Republican efforts to cut spending, lower taxes and stop bad legislation from becoming law.

You can help me battle the liberals in Washington by helping elect David Hobbs to Congress from the 12th District in Tarrant County.

There is a good chance you may already know David Hobbs. If you do, you know his commitment to good government and how hard he has worked to advance our ideas and values. If you don't know David, let me give you a little background.

David served as my Legislative Director for almost five years in Washington, working shoulder to shoulder with me to fight for the principals we believe in and to make this a better country for our children and grandchildren. David's a man I could always count on for the right advice, and to help me do whatever it took to get the job done.

I can't think of anything more important than working to elect bright, articulate and conservative people to Congress. And in all honesty, I don't know any individual who has the skills, the values and the drive to make more of a difference than David Hobbs.

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Mr. Jere Thompson
November 14, 1991
page two

You might remember that when I first ran for Congress in 1984 many people said the Democrat incumbent couldn't be beaten. I knew differently. I'd looked at the numbers very closely, I knew the type of campaign that had to be run, and I knew the effort that I would have to make.

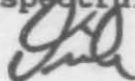
David Hobbs' race is similar in many respects to my first campaign. The numbers are there for a Republican to win, and I can assure you that David will devote the time and energy to make sure that our message is delivered to the voters.

David may have already tried to contact you. If he has, I hope you'll consider helping him in his race. If he hasn't yet tried to reach you, I hope when he calls you'll take a few moments to talk with him about his race and about the issues that are important to us.

Again, I'd really appreciate anything you might be able to do to help David in his race. If you have any questions about David, or if I can be of service to you, please don't hesitate to call me.

With best wishes.

Respectfully yours,



Dick Arney
Member of Congress

P.S. It has always been my goal to help elect three or four bright and committed people to Congress before I retire — people who in their career would be more effective than me in advancing and protecting our shared goals and values. If he is elected, I have no doubt that David Hobbs will be the first of this group of people. Please help him if you can.

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Congressman Dick Armey

Dear Friend:

The U. S. House of Representatives has been controlled by the liberal Democrats for almost 40 years. There are a few of us in Washington who fight battles based on principle -- but we need help.

I would consider it a personal favor if you would support my friend David Hobbs in his campaign for Congress in Texas' 12th District.

Pat Robertson's letter tells you about David's commitment to the principles we share -- protecting the sanctity of innocent human life, fiscal responsibility, and true opportunity through the free enterprise system.

I want you to know about David's devotion to the institution of the American family. He and I share the belief that big government liberals and their special interest groups are attacking the traditional family on all fronts. David, and his wonderful wife Gretchen, will be strong soldiers in the fight to protect the family.

I am counting on you to help, so that David can join me in Washington to fight for the values we share.

Sincerely,



DICK ARMEY
Member of Congress

This is a
copy of the letter
sent to the
Congress in districts
co-side 12

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PAT ROBERTSON
VIRGINIA BEACH, VIRGINIA

June 8, 1992

The liberals in Congress are intent on destroying the fundamental family values that have made our nation and our families strong.

These liberals have trashed our values and mocked everything you and I believe in.

What's more, they're working overtime to find new ways to raid your pocketbook.

They increased federal spending almost 20% in the last two years alone and now our budget is almost \$1.5 trillion.

They raised taxes by \$160 billion in the disastrous budget summit deal... raised our gasoline taxes by an additional nickel per gallon... and are now like hounds at the door waiting for the perfect moment to raise our taxes once again.

The left wing is mounting a well-coordinated attack on virtually every front.

Through their well-funded groups, like Planned Parenthood, the ACLU, People for the American Way, and N.O.W., the liberals are challenging the very freedoms you and I hold. With these special interest groups allied with their friends in Congress, our values are under attack as never before.

We can fight back! We can elect solid, pro-life, pro-family citizens to Congress. People that you and I can trust. People we can count on.

People like that are hard to find... but I've found one. His name is David Hobbs. He is running for Congress as a Republican in Texas' 12th District against liberal incumbent Democrat Pete Geren. I know we can expect great things from David in Congress.

This year may be the most critical election year you and I will see in our lifetimes. Redistricting has changed

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the face of every Congressional district in the country, making many incumbents vulnerable for the first time in a decade. And the scandals rocking Congress will make 1992 an even better year to "clean House."

If we don't fight back now, we'll be faced with the same liberal politicians in control of Congress for perhaps the next ten years. And we'll have only ourselves to blame for missing this opportunity.

David Hobbs is a fighter for the values we share. David is a strong, aggressive advocate for the rights of the unborn. And will fight hard against the pro-abortion, anti-family agenda in Congress.

David is right on all the issues. And he has a proven track record gaining valuable legislative experience at the right hand of one of my favorite Congressmen, Dick Arney.

David Hobbs is a young, energetic conservative who served as Congressman Arney's Legislative Director for almost five years. David personally drafted the amendments to cut funding for the National Endowment for the Arts. He stood side by side with Congressman Arney on the House floor when they beat back the liberals and passed the first cut in spending for the NEA, way back in 1985.

David will stand tall as a Congressman, fighting for traditional family values. He will also lead the way to enacting the strong, pro-growth economic policies America so desperately needs.

For the past several years, David served as President of the Institute for Policy Innovation, a public policy foundation (think tank) near Dallas. (You may have seen David's occasional column, offering the conservative perspective, in the Dallas Morning News or USA Today).

In these times, we need David Hobbs in Congress.

You can send a message -- and get solid, strong representation -- if you join me in helping David Hobbs beat the special interests and get elected to Congress.

David won the Republican Primary in March with an overwhelming 78% of the vote. His victory was achieved by hard work and dedication to principle.

But running for Congress in the general election against a millionaire incumbent is even harder work. David will need all the help we can give him.

(next page, please)

Page 3

Fighting against taxpayer-funded junk mail, the taxpayer-funded staff, and fighting the big bucks from special interest groups requires an incredible amount of work and sacrifice from David.

He's giving it his all. But he needs your help.

David is running a grassroots campaign. He'll be knocking on thousands of doors and recruiting hundreds of volunteers to get out his message. He will send literature through the mail and get his message out through radio and TV.

I'm sure you are familiar with Congressman Henry Hyde, our pro-life champion in the House. Well, Congressman Hyde said of David's race, "Our top priority must be to ensure a pro-life majority in Congress. The best way for you to help in this critical battle is to right now make the largest contribution you can afford to David Hobbs' campaign."

I couldn't agree more. You can be sure the pro-abortion crowd will be raising huge sums of money for David's opponent. We must match them and more.

In electing David Hobbs, our side scores an important victory.

I've told David he can count on my support. I told him I was confident that you would support him also.

I would consider it a personal favor and would greatly appreciate you helping out with whatever you can give. Only with contributions from people like you can we compete with the organized pro-abortion, anti-family lobby.

Can you help in this great effort?

David won't have millions of dollars from special interest groups. He needs people like you to send \$100, \$50, or even \$25 to help him get our message out.

If the Lord has blessed you such that you can afford to send \$500 or \$1,000, it would be a tremendous boost toward David's victory.

I can't stress enough how important it is for us to help elect David Hobbs.

Right now, David needs to raise \$23,000 in the next 20 days to produce mailings, finish outfitting his new

(next page, please)

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Page 4

headquarters, and advance the intensive process of building a grassroots volunteer effort to win this election.

You and I know the power of dedicated volunteers. People and hard work will beat the big bucks from the pro-abortion groups every time. But building a campaign does take money.

The choice is clear. Either we will be governed by the far left wing of the liberal establishment, bent on taking us down the road of moral and economic decay, or we will be governed by those who will support free enterprise, fight big government, and stand up for traditional family values.

Please let David hear from you today.

I'm very proud of David Hobbs for taking on this challenge. I know he'll be an outstanding leader for our side in Washington.

David Hobbs will indeed be one of the "good guys" when he's elected to Congress. I hope you will do everything you can to help him win this important election.

God bless you and your family.

With warmest personal regards, I remain

Sincerely,



Pat Robertson

P.S. Please let David know that you're in this fight to help him bring moral values and economic sanity to Washington. Send in your contribution in the enclosed pre-paid envelope. Your donation of \$25, \$50, or \$100, or more could make the difference in the race. Thank you, again.

93040992276



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 27, 1992

Evelyn Parmer, Chairman
Tarrant County Democratic Party
1209 Lake Street
Fort Worth, TX 76102

RE: MUR 3662

Dear Ms. Parmer:

This letter acknowledges receipt on October 20, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by David Hobbs, David Hobbs for Congress and Randal E. Ferguson, as treasurer, Pat Robertson, Dick Armey, Dick Armey Campaign Committee and Mike Keeling, as treasurer. 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 3662. 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.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

93040992277



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

October 27, 1992

Randal E. Ferguson, Treasurer
David Hobbs for Congress
P.O. Box 821251
Ft. Worth, TX 76182

RE: MUR 3662

Dear Mr. Ferguson:

The Federal Election Commission received a complaint which indicates that David Hobbs for Congress ("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 3662. Please refer to this number in all future correspondence.

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

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

93040992278

Randal E. Ferguson, Treasurer
David Hobbs for Congress
Page 2

If you have any questions, please contact Richard Denholm II, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Teresa A. Hennessy
Assistant General Counsel

Enclosures

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

cc: David Hobbs

93040992279



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

October 27, 1992

David Hobbs
1504 Timber Ridge
Euless, TX 76039

RE: MUR 3662

Dear Mr. Hobbs:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3662. 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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93040992280

David Hobbs
Page 2

If you have any questions, please contact Richard Denholm II, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

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

93040992281



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

October 27, 1992

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

RE: MUR 3662

Dear Mr. Keeling:

The Federal Election Commission received a complaint which indicates that the Dick Armey Campaign Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3662. Please refer to this number in all future correspondence.

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

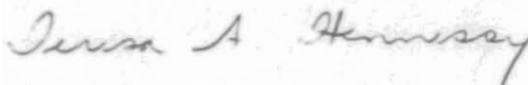
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93040992282

Mike Keeling, Treasurer
Dick Armey Campaign Committee
Page 2

If you have any questions, please contact Richard Denholm II, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Teresa A. Hennessy
Assistant General Counsel

Enclosures

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

cc: The Honorable Richard Armey

93040992283



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

October 27, 1992

The Honorable Richard Arney
130 Cannon House Office Building
Washington, DC 20515-4326

RE: MUR 3662

Dear Mr. Arney:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3662. 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.

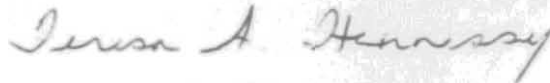
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93040992284

The Honorable Richard Armev
Page 2

If you have any questions, please contact Richard Denholm II, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Teresa A. Hennessy
Assistant General Counsel

Enclosures

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

93040992285



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 27, 1992

Pat Robertson
1000 Centerville Turnpike
Virginia Beach, VA 23463

RE: MUR 3662

Dear Mr. Robertson:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3662. Please refer to this number in all future correspondence.

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

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

93040992286

Pat Robertson
Page 2

If you have any questions, please contact Richard Denholm II, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

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

93040992287



CONGRESSMAN DICK ARMEY
26TH DISTRICT OF TEXAS

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM

Nov 10 11 03 AM '92

November 4, 1992

Teresa A. Hennessy
Assistant General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

92 NOV 10 PM 3:40

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

Dear Teresa,

In regard to MUR 3662, a complaint filed by the Tarrant County Democrat Party against the Dick ArmeY Campaign, we've researched the allegations and wish to provide the following information:

1. Two of the mailings attached (the piece discussing Rep. Geren's use of the frank, and the letter signed by Pat Robertson) were mailings done solely by the David Hobbs Campaign. The Dick ArmeY Campaign had absolutely no involvement, financial or otherwise, with either one. There was a short note signed by Dick ArmeY that was attached to the Pat Robertson mailing, but the project was handled entirely by the Hobbs campaign. I would suggest you contact the David Hobbs Campaign for information regarding this aspect of the complaint.

2. The letter dated November 14, 1991, (marked attachment B in the complaint) signed by Dick ArmeY was sent to approximately 55 individuals. The total cost of the mailing was less than \$20.00. It appears that an error was made in not listing this amount as an in-kind contribution. I've instructed our treasurer to file an amendment listing this contribution.

There was certainly no intent to "hide" this contribution, since the Dick ArmeY Campaign disclaimer is clearly printed on the page. Also, there was certainly no effort to conceal activity to advocate the election of David Hobbs, since a direct contribution was also made to the David Hobbs Campaign during this time.

We will file the necessary amendment to reflect the \$20.00 error. I hope this will satisfy your concerns.

Sincerely,

DICK ARMEY
Member of Congress

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM

Nov 16 11 30 AM '92

November 11, 1992

Ms. Teresa A. Hennessy
Assistant General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 3662

Dear Ms. Hennessy:

I am in receipt of your letter of October 27, 1992 regarding a complaint from Evelyn Parmer, Chairwoman of the Tarrant County Democratic Party, regarding campaign practices of David Hobbs, a candidate for the United States House of Representatives in the 12th Congressional District of Texas, and his principal campaign committee.

That complaint does not allege or imply that I have violated the federal election laws. The complaint merely attaches, as an exhibit, a letter over my signature discussing Mr. Hobb's candidacy. As the complaint states, that letter and the reply device demonstrates that the David Hobbs for Congress campaign committee placed an appropriate disclosure statement on the fund-raising materials. That letter was solicited by the Hobbs campaign committee, was paid for, to the best of my knowledge, by the committee, and was mailed by the committee to people with whom I am not acquainted.

Neither I nor any organization associated with me expended any funds whatsoever on this mailing, nor were we responsible for the recipients to whom it was sent.

Since no complaint has been made against me and there is no allegation that I was involved in any alleged federal election law violations, the Commission should take no further action concerning me in MUR 3662.

Sincerely,

M.G. "Pat" Robertson

MGR:baj

92 NOV 16 PM 3:29

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE
GENERAL COUNSEL

93040992289

David Hobbs

U.S. Congress

November 11, 1992

Federal Election Commission
Office of the General Counsel
Washington, D.C. 20463

Re: David Hobbs for Congress RESPONSE
MUR 3662

Dear Commissioners:

The David Hobbs for Congress Committee (hereafter referred to as "Respondent") comes forth to answer the complaint filed by the Tarrant County Democrat Party.

RESPONSE TO COMPLAINT #1. The mailing in question (see Attachment "A") was sent to a select group of 12th District residents. After a portion of said mailing was deposited with the U.S. Postal Service, the inadvertent omission of the disclaimer was noted. The omission resulted from typesetting error.

Respondent informally notified the legal division of the Federal Election Commission to seek guidance on rectifying the omission. Respondent was advised that there were no clear guidelines to rectify this situation, short of respondent filing a complaint against itself.

Before the balance of the mailing was deposited with the U.S. Postal Service, Respondent contacted the outside vendor responsible for this mailing. Respondent caused the appropriate disclaimer to be affixed to the balance of said mailing. (See Attachment "A" above postal indicia.)

It is apparent from the content of the mailing that it was never the intent of Respondent to obscure either the source of the mailing or the identity of exactly who was paying for the mailing. The mailing made several references to David Hobbs, it contained the Hobbs campaign logo, and it addressed Hobbs' plan to reform Congress.

Throughout the campaign, Respondent sent several pieces of voter contact mail to the exact same universe of 12th District voters. In every case, the appropriate disclaimer was displayed.

Respondent regrets the inadvertent omission, but believes that there could be little doubt in the minds of the recipients as to the origin of the campaign literature.

Mailing Address: Post Office Box 821251 • Fort Worth, Texas 76182 • (817) 877-3115

Paid for by David Hobbs for Congress Committee • Campaign Headquarters • 2018 West Vickery Boulevard • Fort Worth, Texas 76102

Contributions are not deductible as charitable contributions for income tax purposes.

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM
NOV 15 11 52 AM '92

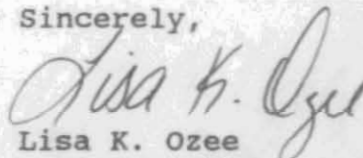
92 NOV 15 PM 3:26

9304092290

Federal Election Commission (Ref. MUR 3662)
November 11, 1992
Page 2

RESPONSE TO COMPLAINT #2. Respondent did receive an in-kind contribution from the Dick Armey Campaign Committee when the Armey Committee caused to be mailed a fund raising letter dated November 14, 1991. The letter in question was mailed to 56 individuals at an estimated cost of \$0.35 per letter (including postage). Accordingly, Respondent has filed an amended FEC report reflecting the erroneously omitted \$19.60 in-kind contribution. Attached is a copy of said amended FEC report.

Sincerely,



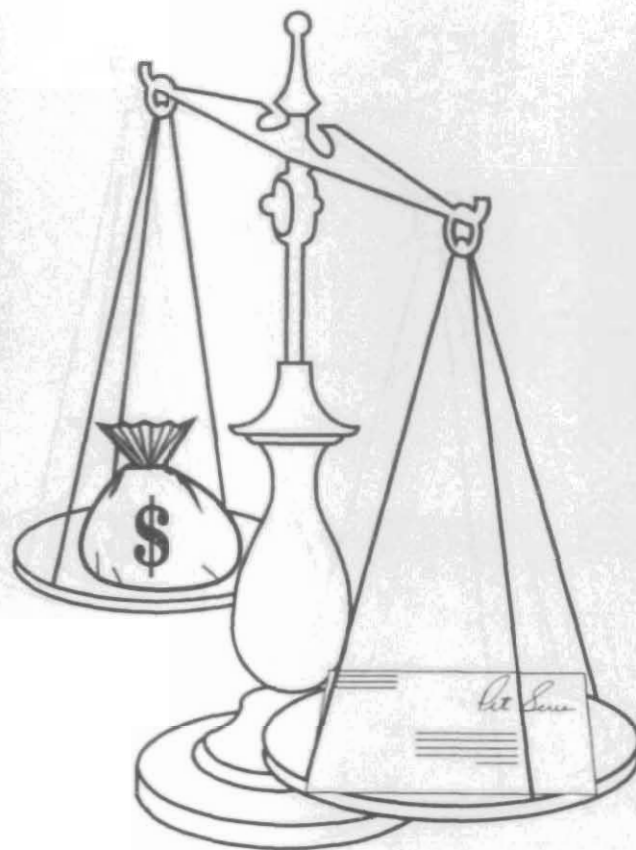
Lisa K. Ozee
Assistant Treasurer

93040992291

**A
Federal Court
Can't Stop
Pete Geren
From
Breaking The Law**

92 NOV 16 PM 3:26

RECEIVED
FEDERAL BUREAU OF INVESTIGATION
NOV 16 1992



But You Can.

93040992292

93040992293

Pete Geren is campaigning for re-election using our tax dollars. And that's illegal.

U.S. Court of Appeals calls it unconstitutional

- On July 30, 1992, a federal court ruled it was "unconstitutional" for incumbent congressmen to send mass mailings (at taxpayer expense) to voters who live outside their current districts.

Congress made it illegal

- Later on the same day, the U.S. Congress made these mailings "illegal," and instructed congressmen to stop sending mailings outside their current districts.

Geren defies the court and Congress itself.

- In late August, Congressman Pete Geren sent several mass mailings -- all paid for by the taxpayers -- to persons who live outside his current district.
- Geren's illegal mailings may have cost the taxpayers tens of thousands of dollars.

"Why are some representatives abusing that privilege to mail outside their existing districts? Simply to increase their name recognition for the upcoming election."

Joe Barton
Guest Editorial for the
Fort Worth Star-Telegram
April 30, 1992

Pete Geren blames the Post Office . . .

. . . David Hobbs says that's "baloney."

Please read the testimony on the next page.

You decide.



The Ruling of the Court

In the July 30, 1992, ruling, one of the judges in the case said that congressional mailings outside of current district lines are "no different from giving every incumbent \$100,000 to hold campaign rallies in the new area . . . government funding of [this] promotes the incumbent's re-election, without enhancing his capacity to serve his constituents, and is therefore impermissible..."



"I live in one of the areas that the court said Geren can't send his 'congressional' mail. Yet I got his illegal mailings. Geren is the kind of self-serving politician we don't need in Washington."

-- Margaret Russey

"When we found out that all of the mail we've been getting from Pete Geren is illegal since we live outside his current district, we got mad. Why do these politicians waste so much of our money talking about nothing but themselves?"

-- The Greg Kelly Family



"Why is Geren charging the taxpayers for all this self-promotional mail? Joe Barton is my current congressman. And David Hobbs is going to be my new congressman. Pete Geren's illegal mail is proof that he's part of the problem in Washington."

-- Marjorie Nunn

Pete Geren broke the law.

From the above testimony, it's obvious folks who live outside Geren's current district have received his "congressional" mail -- at taxpayer expense. Geren is trying to promote his political career in the new areas where he is seeking reelection.

This mail was unsolicited, and many received

the mail in individually addressed envelopes, which means the Post Office did not "goof up," as Pete Geren would have us believe.

Geren intentionally sent illegal mail to voters in the new district, after a federal court ruled it unconstitutional and after Congress made such mail illegal.

**Your vote for David Hobbs will
stop Pete Geren from breaking the law.**

*"No one is above the law.
But some of our Congressmen
don't know that.
It's time to 'clean House'
in Washington."*

-- David Hobbs

David Hobbs' Plan to Reform Congress

- Term Limits
- Stop illegal congressional mailings
- Cut Congress' budget; eliminate unnecessary staff & committees
- Full investigation of congressional corruption
- Audit Congress by independent accountants
- Curtail perks & privileges

Congress serves itself -- not you!



Change Congress. Now!

David[★]Hobbs

U.S. Congress

PAID FOR BY
DAVID HOBBS
FOR CONGRESS

Post Office Box 821251
Fort Worth, Texas 76182

Bulk Rate
U.S. Postage
PAID
Permit #1249
Fort Worth, TX

UNLIKE
Incumbent Pete Geren's mail
this was
NOT
paid for at
taxpayer expense.

93040992295

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) David Hobbs for Congress		2. FEC IDENTIFICATION NUMBER C00257220
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. P.O. Box 821251		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY, STATE and ZIP CODE Ft. Worth, TX 76182	STATE/DISTRICT	

4. TYPE OF REPORT

- ☐ April 15 Quarterly Report ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ July 15 Quarterly Report ☐ Thirtieth day report following the General Election on _____
in the State of _____
- ☒ January 31 Year End Report ☐ Termination Report
- ☐ July 31 Mid-Year Report (Non-election Year Only) ☐ Special Election ☐ Runoff Election
- 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
<u>11-20-91</u> through <u>12-31-91</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	25,615.26	
(b) Total Contribution Refunds (from Line 20(d))	-	
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	25,615.26	
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	5,183.23	
(b) Total Offsets to Operating Expenditures (from Line 14)	-	
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	5,183.23	
8. Cash on Hand at Close of Reporting Period (from Line 27)	20,432.03	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	-	

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

Type or Print Name of Treasurer Lisa K. Ozece, Assistant Treasurer	Date 11-11-92
Signature of Treasurer <i>Lisa K. Ozece, Assistant Treasurer</i>	

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 3
(revised 4/87)

93040992296

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full)

David Hobbs for Congress

Report Covering the Period:

From: 11-20-91

To: 12-31-91

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A)

(ii) Unitemized

(iii) Total of contributions from individuals

(b) Political Party Committees

(c) Other Political Committees (such as PACs)

(d) The Candidate

(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))

COLUMN A
Total This Period

COLUMN B
Calendar Year-To-Date

25,264.60

300.00

25,564.60

45.66

25,610.26

25,615.26

11(a)(i)

11(a)(ii)

11(a)(iii)

11(b)

11(c)

11(d)

11(e)

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.

13. LOANS:

(a) Made or Guaranteed by the Candidate

(b) All Other Loans

(c) TOTAL LOANS (add 13(a) and (b))

1561.35

1561.35

1561.35

13(a)

13(b)

13(c)

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

15. OTHER RECEIPTS (Dividends, Interest, etc.)

16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)

27,176.61

II. DISBURSEMENTS

17. OPERATING EXPENDITURES

5183.23

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed by the Candidate

(b) Of All Other Loans

(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))

1561.35

1561.35

1561.35

19(a)

19(b)

19(c)

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees (such as PACs)

(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))

21. OTHER DISBURSEMENTS

22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21).

6744.58

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD

\$ 0

24. TOTAL RECEIPTS THIS PERIOD (from Line 16)

\$ 27,176.61

25. SUBTOTAL (add Line 23 and Line 24)

\$ 27,176.61

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)

\$ 6,744.58

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)

\$ 20,432.03

93040992297

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 3 OF 110
FOR LINE NUMBER 11(a)

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)

David Hobbs for Congress

<p>A. Full Name, Mailing Address and ZIP Code Barry C. Balser 18106 Heaton Houston, TX 77084</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer British Petroleum</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 11-20-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>B. Full Name, Mailing Address and ZIP Code James R. Lightner 5905 Steuben Ct. Dallas, TX 75248</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Self</p> <p>Occupation Engineer</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 11-20-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>C. Full Name, Mailing Address and ZIP Code Mrs. James Lightner 5905 Steuben Ct. Dallas, TX 75248</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation homemaker</p> <p>Aggregate Year-to-Date > \$ 1,000</p>	<p>Date (month, day, year) 11-20-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>D. Full Name, Mailing Address and ZIP Code Susan Balser 18106 Heaton Houston, TX 77084</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation homemaker</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 11-20-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>E. Full Name, Mailing Address and ZIP Code Nancy C. Hobbs 10914 Mary's Lane Houston, TX 77079</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation homemaker</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 11-20-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>F. Full Name, Mailing Address and ZIP Code Mr. Raymond Hobbs 10914 Mary's Lane Houston, TX 77079</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Chevron Oil</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 11-20-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>G. Full Name, Mailing Address and ZIP Code Mr. George Hickox, Sr. 13518 Westport Houston, TX 77079</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Self</p> <p>Occupation Engineering Consultant</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 11-27-91</p>	<p>Amount of Each Receipt this Period 1,000</p>

SUBTOTAL of Receipts This Page (optional)

7,000.-

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 4 OF 110
FOR LINE NUMBER 11(a)

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)

David Hobbs for Congress

<p>A. Full Name, Mailing Address and ZIP Code Mr. George Hickox, Jr. 333 Oakwood Lane Devon, PA 19333</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Heller Hickox, Dimeling, Scheiber Parks</p> <p>Occupation Investments</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 11-20-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>B. Full Name, Mailing Address and ZIP Code Mr. Edward Gillespie 1004 G Street, S.E. Washington, DC 20003</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Joint Economic Committee</p> <p>Occupation Republican Staff Director</p> <p>Aggregate Year-to-Date > \$ 500</p>	<p>Date (month, day, year) 11-27-91</p>	<p>Amount of Each Receipt this Period 500</p>
<p>C. Full Name, Mailing Address and ZIP Code Mr. Arnold Petsche 2211 Shadywood Ct. Arlington, TX 76012</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer A.E. Petsche</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 11-27-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>D. Full Name, Mailing Address and ZIP Code Mrs. Arnold Petsche 2211 Shadywood Ct. Arlington, TX 76012</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation homemaker</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 11-27-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>E. Full Name, Mailing Address and ZIP Code Mr. W W Caruth, III 9710 Boedecker Dallas, TX 75230</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer self</p> <p>Occupation Investor</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 12-2-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>F. Full Name, Mailing Address and ZIP Code Mr. Paul Farago 1026 Von Phister Key West, FL 33040</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer requested</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$ 500</p>	<p>Date (month, day, year) 12-2-91</p>	<p>Amount of Each Receipt this Period 500 -</p>
<p>G. Full Name, Mailing Address and ZIP Code Mr. Robert Morrison 2982 Brown Rd. Ashtabula, OH 44004</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer requested</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$ 500</p>	<p>Date (month, day, year) 12-2-91</p>	<p>Amount of Each Receipt this Period 500.</p>

SUBTOTAL of Receipts This Page (optional)

5,500.-

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 5 OF 110
FOR LINE NUMBER 11(a)

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)

David Hobbs for Congress

<p>A. Full Name, Mailing Address and ZIP Code Mr. John Kazar 6821 Younger The Colony, TX 75056</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Hydroline Contracting</p> <p>Occupation General Contractor</p> <p>Aggregate Year-to-Date > \$ 500</p>	<p>Date (month, day, year) 12-2-91</p>	<p>Amount of Each Receipt this Period 500.</p>
<p>B. Full Name, Mailing Address and ZIP Code Mr. Ron Lusk 1612 Boardwalk Arlington, TX 76011</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer American Medical Services</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 12-12-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>C. Full Name, Mailing Address and ZIP Code Mr. John Ratliff 1140 Ft. Worth Club Tower Ft. Worth, TX 76102</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer RCM Corp.</p> <p>Occupation Executive</p> <p>Aggregate Year-to-Date > \$ 500</p>	<p>Date (month, day, year) 12-12-91</p>	<p>Amount of Each Receipt this Period 500.</p>
<p>D. Full Name, Mailing Address and ZIP Code Lori Hart 2055 Pearwood Path Roswell, GA 30076</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation homemaker</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 12-12-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>E. Full Name, Mailing Address and ZIP Code Stephen Hart 2055 Pearwood Path Roswell, PA 30076</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Poly Tech South, Inc</p> <p>Occupation President</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 12-12-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>F. Full Name, Mailing Address and ZIP Code William Bowen 900 Meadows Bldg. Dallas, TX 75206</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer requested</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 12-23-91</p>	<p>Amount of Each Receipt this Period 1,000</p>
<p>G. Full Name, Mailing Address and ZIP Code H. E. Chiles 1300 Shady Oaks Lane Ft Worth, TX 76116</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer requested</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$ 1000</p>	<p>Date (month, day, year) 12-23-91</p>	<p>Amount of Each Receipt this Period 1,000</p>

SUBTOTAL of Receipts This Page (optional)

6,000

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
filed Summary PagePAGE 6 OF 10
FOR LINE NUMBER 11(a)

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)

David Hobbs for Congress

A. Full Name, Mailing Address and ZIP Code Fran Chiles 1300 Shady Oaks Lane Ft. Worth, TX 76116 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer requested Occupation Aggregate Year-to-Date > \$ 1000	Date (month, day, year) 12-23-91	Amount of Each Receipt this Period 1,000
B. Full Name, Mailing Address and ZIP Code Joe Lester 3519 Spring Meadow Lane Flower Mound, TX 75028 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Lescon Construction Inc. Occupation General Contractor Aggregate Year-to-Date > \$ 1000	Date (month, day, year) 12-23-91	Amount of Each Receipt this Period 1,000
C. Full Name, Mailing Address and ZIP Code Andrea Lester 3519 Spring Meadow Lane Flower Mound, TX 75028 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation homemaker Aggregate Year-to-Date > \$ 1000	Date (month, day, year) 12-23-91	Amount of Each Receipt this Period 1,000
D. Full Name, Mailing Address and ZIP Code Robert Carrel 5220 Briar Tree Dr. Dallas, TX 75248 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Retired Occupation Aggregate Year-to-Date > \$ 1000	Date (month, day, year) 12-23-91	Amount of Each Receipt this Period 1,000
E. Full Name, Mailing Address and ZIP Code Ronald Reede 400 E. 57th St., #12A New York, NY 10022 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Salomon Bros. Occupation Broker Aggregate Year-to-Date > \$ 250	Date (month, day, year) 12-23-91	Amount of Each Receipt this Period 250.-
F. Full Name, Mailing Address and ZIP Code Nina Hickox 3334 Harrison Kansas City, MO 64109 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Price Waterhouse Occupation accountant Aggregate Year-to-Date > \$ 500	Date (month, day, year) 12-23-91	Amount of Each Receipt this Period 500.-
G. Full Name, Mailing Address and ZIP Code Bob Perry P.O. Box 34153 Houston, TX 77234 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Perry Homes Occupation chairman Aggregate Year-to-Date > \$ 1000	Date (month, day, year) 12-23-91	Amount of Each Receipt this Period 1,000

SUBTOTAL of Receipts This Page (optional)

5,750

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 7 OF 10
FOR LINE NUMBER 11(a)

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)

David Hobbs for Congress

A. Full Name, Mailing Address and ZIP Code

Doyle Perry
P.O. Box 34153
Houston, TX 77234

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

12-23-92

1,000.00

Occupation

Homemaker

Aggregate Year-to-Date > \$ 1000

Receipt For:

☒ Primary☐ General☐ Other (specify):

B. Full Name, Mailing Address and ZIP Code

Dick Army Campaign Cante.
P.O. Box 85
Lewisville, TX 75067

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

In kind contribution

11-14-92

19.60

Occupation

Aggregate Year-to-Date > \$ 19.60

Receipt For:

☒ Primary☐ General☐ Other (specify):

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Aggregate Year-to-Date > \$

Receipt For:

☐ Primary☐ General☐ Other (specify):

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Aggregate Year-to-Date > \$

Receipt For:

☐ Primary☐ General☐ Other (specify):

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Aggregate Year-to-Date > \$

Receipt For:

☐ Primary☐ General☐ Other (specify):

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Aggregate Year-to-Date > \$

Receipt For:

☐ Primary☐ General☐ Other (specify):

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Aggregate Year-to-Date > \$

Receipt For:

☐ Primary☐ General☐ Other (specify):

SUBTOTAL of Receipts This Page (optional)

1,019.60

TOTAL This Period (last page this line number only)

25,269.60

93040992302

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE **8** OF **10**
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)

David Hobbs for Congress

A. Full Name, Mailing Address and ZIP Code GOPAC 440 First St. N.W. # 400 Washington, DC 20001 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Political Cmte. In Kind contribution Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 12-17-91	Amount of Each Receipt this Period 45.66
B. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

45.66

TOTAL This Period (last page this line number only)

45.66

93040992303

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 9 OF 10
FOR LINE NUMBER 17

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)

> David Hobbs for Congress

<p>A. Full Name, Mailing Address and ZIP Code The Eccles Group #172 3300 S. Gessner Houston, TX 77063</p>	<p>Purpose of Disbursement consulting</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 10-21-91 11-25-91</p>	<p>Amount of Each Disbursement This Period 1,250.00 2,25.00</p>
<p>B. Full Name, Mailing Address and ZIP Code David Hobbs P.O. Box 821251 Ft. Worth, TX 76182</p>	<p>Purpose of Disbursement Reimbursement for traveling expenses - seminar</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 12-17-91</p>	<p>Amount of Each Disbursement This Period 871.10</p>
<p>C. Full Name, Mailing Address and ZIP Code Office Depot 7800 Grapevine Hwy N. Richland Hills, TX 76180</p>	<p>Purpose of Disbursement office Equipment</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 12-19-91</p>	<p>Amount of Each Disbursement This Period 373.22</p>
<p>D. Full Name, Mailing Address and ZIP Code GOPAC 440 First St. NW #400 Washington, D.C. 20001</p>	<p>Purpose of Disbursement In kind contribution candidate recruitment activities</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 12-17-91</p>	<p>Amount of Each Disbursement This Period 45.66</p>
<p>E. Full Name, Mailing Address and ZIP Code Dick Arney Campaign Cmte. P.O. Box 85 Lewisville, TX 75067</p>	<p>Purpose of Disbursement In kind contribution fundraising letter</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 11-14-92</p>	<p>Amount of Each Disbursement This Period 19.60</p>
<p>F. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>H. Full Name, Mailing Address and ZIP Code David Hobbs P.O. Box 821251 Ft. Worth, TX 76182</p>	<p>Purpose of Disbursement Repayment of loan</p> <p>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 12-2-91</p>	<p>Amount of Each Disbursement This Period 1,561.35</p>
<p>I. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>TOTAL of Disbursements This Page (optional)</p>			<p>4,809.58</p>
<p>TOTAL This Period (last page this line number only)</p>			<p>4,809.58</p>

SCHEDULE C
(Revised 3/80)

LOANS

Page 10 of 10 for 13(a)
LINE NUMBER
(Use separate schedules
for each numbered line)

Name of Committee (in full) David Hobbs for Congress				
A. Full Name, Mailing Address and ZIP Code of Loan Source David Hobbs (personal funds) P.O. Box 821251 Ft. Worth TX 76182 Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Original Amount of Loan 1,561.35	Cumulative Payment To Date 1,561.35	Balance Outstanding at Close of This Period 0	
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code	Name of Employer	<div style="background-color: #cccccc; height: 100px;"></div>		
	Occupation			
	Amount Guaranteed Outstanding: \$			
2. Full Name, Mailing Address and ZIP Code	Name of Employer	<div style="background-color: #cccccc; height: 100px;"></div>		
	Occupation			
	Amount Guaranteed Outstanding: \$			
3. Full Name, Mailing Address and ZIP Code	Name of Employer	<div style="background-color: #cccccc; height: 100px;"></div>		
	Occupation			
	Amount Guaranteed Outstanding: \$			
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code	Name of Employer	<div style="background-color: #cccccc; height: 100px;"></div>		
	Occupation			
	Amount Guaranteed Outstanding: \$			
2. Full Name, Mailing Address and ZIP Code	Name of Employer	<div style="background-color: #cccccc; height: 100px;"></div>		
	Occupation			
	Amount Guaranteed Outstanding: \$			
3. Full Name, Mailing Address and ZIP Code	Name of Employer	<div style="background-color: #cccccc; height: 100px;"></div>		
	Occupation			
	Amount Guaranteed Outstanding: \$			
SUBTOTALS This Period This Page (optional)				
TOTALS This Period (last page in this line only)				0
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.				

93040992305

MUR # 3662

ADDITIONAL DOCUMENTS WILL BE ADDED TO THIS FILE AS THEY
BECOME AVAILABLE. PLEASE CHECK FOR ADDITIONAL MICROFILM
LOCATIONS.

93040992306



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

THIS IS THE End of MUR# 3662

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN Mc

93040992307



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

☒ Microfilm
☐ Public Records
☐ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3662.

12/10/93

23043543425

THE READER IS REFERRED TO ADDITIONAL MICROFILM LOCATIONS
FOR THE FOLLOWING DOCUMENTS PERTINENT TO THIS CASE

1. Memo, General Counsel to the Commission, dated September 22, 1992, Subject: Priority System Report.
See Reel 354, pages 1590-94.
2. Memo, General Counsel to the Commission, dated April 14, 1993, Subject: Enforcement Priority System.
See Reel 354, pages 1595-1620.
3. Certification of Commission vote, dated April 28, 1993.
See Reel 354, pages 1621-22.
4. General Counsel's Report, In the Matter of Enforcement Priority, dated December 3, 1993.
See Reel 354, pages 1623-1740.
5. Certification of Commission vote, dated December 9, 1993.
See Reel 354, pages 1741-1746.

23043543426



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1992

Randal E. Ferguson, Treasurer
David Hobbs for Congress
P.O. Box 821251
Fort Worth, TX 76182

RE: MUR 3662

Dear Mr. Ferguson:

On October 27, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against David Hobbs for Congress and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Richard M. Denholm II
Attorney

Attachment
Narrative

Date the Commission voted to close the file:

DEC 9 1992

23043543427

MUR 3662
David Hobbs for Cong

23043543428

This matter was initiated by a complaint filed by the Tarrant County Democratic Party. The principal respondents are: David Hobbs for Congress Committee, David Hobbs, Pat Robertson, Dick Arney Campaign Committee, and The Honorable Richard Arney. The allegations concern the failure to include a disclaimer in certain mailings, and the failure to report an in-kind contribution from the Arney Campaign Committee. In response, the Hobbs committee did admit to omitting the required disclaimer from mailings. The Hobbs committee argued that the failure to include a disclaimer was a typesetting error. It was corrected, and the committee provided a copy of the revised mailing with a disclaimer. From the information provided, it is not clear how many pieces of mail were distributed without the disclaimer. Further, both the Hobbs Committee and the Arney Committee admitted that the Arney Committee made an in-kind contribution on behalf of Hobbs. Both committees also admitted that the in-kind contribution was not reported. The Hobbs committee submitted amended reports showing the in-kind contribution amounting to \$19.60. In his response, Congressman Arney stated that the mailing was sent to a small group and was valued under \$20.00. He stated that amended reports would be filed. Finally, Pat Robertson denied that he expended any funds for the mailing at issue.

This matter involves no significant issue relative to the other issues pending before the Commission, an insubstantial amount of money, and significant remedial action.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1992

David Hobbs
1504 Timber Ridge
Euless, TX 76039

RE: MUR 3662

Dear Mr. Hobbs:

On October 27, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against you. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Richard M. Denholm II
Attorney

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1992

23043543429

23043543430

MUR 3662

David Hobbs for Cong

This matter was initiated by a complaint filed by the Tarrant County Democratic Party. The principal respondents are: David Hobbs for Congress Committee, David Hobbs, Pat Robertson, Dick Arney Campaign Committee, and The Honorable Richard Arney. The allegations concern the failure to include a disclaimer in certain mailings, and the failure to report an in-kind contribution from the Arney Campaign Committee. In response, the Hobbs committee did admit to omitting the required disclaimer from mailings. The Hobbs committee argued that the failure to include a disclaimer was a typesetting error. It was corrected, and the committee provided a copy of the revised mailing with a disclaimer. From the information provided, it is not clear how many pieces of mail were distributed without the disclaimer. Further, both the Hobbs Committee and the Arney Committee admitted that the Arney Committee made an in-kind contribution on behalf of Hobbs. Both committees also admitted that the in-kind contribution was not reported. The Hobbs committee submitted amended reports showing the in-kind contribution amounting to \$19.60. In his response, Congressman Arney stated that the mailing was sent to a small group and was valued under \$20.00. He stated that amended reports would be filed. Finally, Pat Robertson denied that he expended any funds for the mailing at issue.

This matter involves no significant issue relative to the other issues pending before the Commission, an insubstantial amount of money, and significant remedial action.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Pat Robertson
1000 Centerville Turnpike
Virginia Beach, VA 23463

RE: MUR 3662

Dear Mr. Robertson:

On October 27, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against you. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Richard M. Denholm II
Attorney

Attachment
Narrative

Date the Commission voted to close the file: _____

DEC 09 1993

23043543431

MUR 3662

David Hobbs for Cong

23043543432

This matter was initiated by a complaint filed by the Tarrant County Democratic Party. The principal respondents are: David Hobbs for Congress Committee, David Hobbs, Pat Robertson, Dick Arney Campaign Committee, and The Honorable Richard Arney. The allegations concern the failure to include a disclaimer in certain mailings, and the failure to report an in-kind contribution from the Arney Campaign Committee. In response, the Hobbs committee did admit to omitting the required disclaimer from mailings. The Hobbs committee argued that the failure to include a disclaimer was a typesetting error. It was corrected, and the committee provided a copy of the revised mailing with a disclaimer. From the information provided, it is not clear how many pieces of mail were distributed without the disclaimer. Further, both the Hobbs Committee and the Arney Committee admitted that the Arney Committee made an in-kind contribution on behalf of Hobbs. Both committees also admitted that the in-kind contribution was not reported. The Hobbs committee submitted amended reports showing the in-kind contribution amounting to \$19.60. In his response, Congressman Arney stated that the mailing was sent to a small group and was valued under \$20.00. He stated that amended reports would be filed. Finally, Pat Robertson denied that he expended any funds for the mailing at issue.

This matter involves no significant issue relative to the other issues pending before the Commission, an insubstantial amount of money, and significant remedial action.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

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

RE: MUR 3662

Dear Mr. Keeling:

On October 27, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Dick Arney Campaign Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Richard M. Denholm II
Attorney

Attachment
Narrative

Date the Commission voted to close the file:

DEC 09 1993

2304354333

MUR 3662

David Hobbs for Cong

2 3 0 4 3 5 4 3 4 3 4

This matter was initiated by a complaint filed by the Tarrant County Democratic Party. The principal respondents are: David Hobbs for Congress Committee, David Hobbs, Pat Robertson, Dick Arney Campaign Committee, and The Honorable Richard Arney. The allegations concern the failure to include a disclaimer in certain mailings, and the failure to report an in-kind contribution from the Arney Campaign Committee. In response, the Hobbs committee did admit to omitting the required disclaimer from mailings. The Hobbs committee argued that the failure to include a disclaimer was a typesetting error. It was corrected, and the committee provided a copy of the revised mailing with a disclaimer. From the information provided, it is not clear how many pieces of mail were distributed without the disclaimer. Further, both the Hobbs Committee and the Arney Committee admitted that the Arney Committee made an in-kind contribution on behalf of Hobbs. Both committees also admitted that the in-kind contribution was not reported. The Hobbs committee submitted amended reports showing the in-kind contribution amounting to \$19.60. In his response, Congressman Arney stated that the mailing was sent to a small group and was valued under \$20.00. He stated that amended reports would be filed. Finally, Pat Robertson denied that he expended any funds for the mailing at issue.

This matter involves no significant issue relative to the other issues pending before the Commission, an insubstantial amount of money, and significant remedial action.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

The Honorable Richard Arney
130 Cannon House Office Building
Washington, DC 20515-4326

RE: MUR 3662

Dear Representative Arney:

On October 27, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against you. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

[Signature]
Richard M. Denholm II
Attorney

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043543435

MUR 3662

David Hobbs for Cong

2304354336

This matter was initiated by a complaint filed by the Tarrant County Democratic Party. The principal respondents are: David Hobbs for Congress Committee, David Hobbs, Pat Robertson, Dick Arney Campaign Committee, and The Honorable Richard Arney. The allegations concern the failure to include a disclaimer in certain mailings, and the failure to report an in-kind contribution from the Arney Campaign Committee. In response, the Hobbs committee did admit to omitting the required disclaimer from mailings. The Hobbs committee argued that the failure to include a disclaimer was a typesetting error. It was corrected, and the committee provided a copy of the revised mailing with a disclaimer. From the information provided, it is not clear how many pieces of mail were distributed without the disclaimer. Further, both the Hobbs Committee and the Arney Committee admitted that the Arney Committee made an in-kind contribution on behalf of Hobbs. Both committees also admitted that the in-kind contribution was not reported. The Hobbs committee submitted amended reports showing the in-kind contribution amounting to \$19.60. In his response, Congressman Arney stated that the mailing was sent to a small group and was valued under \$20.00. He stated that amended reports would be filed. Finally, Pat Robertson denied that he expended any funds for the mailing at issue.

This matter involves no significant issue relative to the other issues pending before the Commission, an insubstantial amount of money, and significant remedial action.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DEC 10 1993

Evelyn Parmer, Chairman
Tarrant County Democratic Party
1209 Lake Street
Fort Worth, TX 76102

RE: MUR 3662

Dear Ms. Parmer:

On October 20, 1992, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against David Hobbs for Congress and Randal E. Ferguson, as treasurer, David Hobbs, Pat Robertson, Dick Armey Campaign Committee and Mike Keeling, as treasurer, and the Honorable Richard Armey. See attached narrative. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Richard M. Denholm II
Attorney

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043543437

MUR 3662

David Hobbs for Cong

230435438

This matter was initiated by a complaint filed by the Tarrant County Democratic Party. The principal respondents are: David Hobbs for Congress Committee, David Hobbs, Pat Robertson, Dick Arney Campaign Committee, and The Honorable Richard Arney. The allegations concern the failure to include a disclaimer in certain mailings, and the failure to report an in-kind contribution from the Arney Campaign Committee. In response, the Hobbs committee did admit to omitting the required disclaimer from mailings. The Hobbs committee argued that the failure to include a disclaimer was a typesetting error. It was corrected, and the committee provided a copy of the revised mailing with a disclaimer. From the information provided, it is not clear how many pieces of mail were distributed without the disclaimer. Further, both the Hobbs Committee and the Arney Committee admitted that the Arney Committee made an in-kind contribution on behalf of Hobbs. Both committees also admitted that the in-kind contribution was not reported. The Hobbs committee submitted amended reports showing the in-kind contribution amounting to \$19.60. In his response, Congressman Arney stated that the mailing was sent to a small group and was valued under \$20.00. He stated that amended reports would be filed. Finally, Pat Robertson denied that he expended any funds for the mailing at issue.

This matter involves no significant issue relative to the other issues pending before the Commission, an insubstantial amount of money, and significant remedial action.