

FEDERAL ELECTION COMMISSION
PUBLIC INFORMATION OFFICE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2012 JUN 25 AM 10:10

MS-U

June 4, 2012

RONALD SIMMONS CAMPAIGN
805 LADY OF THE LAKE
LEWISVILLE, TX 75056

Dear Treasurer:

Response Due Date

07/09/2012

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act ("the Act") but are not registered with the Commission.

- The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures for the purpose of influencing any election for federal office aggregating in excess of \$1,000 during a calendar year. (2 U.S.C. §431(4) and 11 CFR § 100.5)

A review of the receipts reported by the "DENTON COUNTY REPUBLICAN VICTORY FUND" indicates that your organization may have made expenditures in excess of \$1,000 during the calendar year 2012 to influence federal elections. The term "expenditures" includes contributions to federal candidates and committees supporting federal candidates. (2 U.S.C. §431(9)). This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

1) submit a Statement of Organization and file disclosure reports on FEC FORM 3X (Copies of FEC FORMs 1 and 3X can be downloaded from the FEC website at <http://www.fec.gov>, or requested through the FEC Fax line at (202) 501-3413); or

2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

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If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission by the response due date noted above of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division). My local number is (202) 694-1141.

Sincerely,



Daniel Buckley
Senior Campaign Finance Analyst
Reports Analysis Division

Donna García Davidson
ATTORNEY AND COUNSELOR AT LAW
P.O. BOX 12131
AUSTIN, TEXAS 78711

RECEIVED

2012 JUN 25 AM 8:52

Telephone: 512.775.7625
Toll Free Fax: 877.200.6001

FEC MAIL CENTER
E-mail: donna@dgdlawfirm.com
Website: www.dgdlawfirm.com

June 19, 2012

Via Certified Mail Return Receipt Requested #7011 0470 0001 0149 3039

Mr. Daniel Buckley
Senior Campaign Finance Analyst
Federal Election Commission
Washington, DC 20463

Re: Ron Simmons, Candidate for State Representative District 65

Dear Mr. Buckley:

On behalf of Ron Simmons, this letter is to respond to your correspondence to my client dated June 4, 2012, with a response due date of July 9, 2012 (enclosed). Pursuant to your correspondence as well as my follow up conversation with an analyst¹ in your office, my client made a written request to the Denton County Republican Party.

In that request, in accordance with the directions provided by your letter, we asked that the funds reflected as contributions of \$2500 and \$25 from my client's campaign account be transferred to a non-federal account. A copy of the written request is enclosed. For your information, we have also enclosed a copy of the check as written which was to the "Denton GOP" with no indication that it was intended as a contribution that may be used for federal candidates. In fact, the \$2500 contribution was to pay for my client and his guests to attend a Lincoln-Reagan Day banquet and he had no intention of making a contribution to federal candidates with that money.

Thank you in advance for your assistance in this matter and please do not hesitate to contact me if you have any questions or need further information.

Sincerely,


Donna García Davidson

DGD/dr
Enclosures
cc: Ron Simmons

¹ On Monday, June 11, 2012, I spoke to David in your office and discussed this matter more fully.

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Donna García Davidson
ATTORNEY AND COUNSELOR AT LAW
P.O. BOX 12131
AUSTIN, TEXAS 78711

Telephone: 512.775.7625
Toll Free Fax: 877.200.6001

E-mail: donna@dgdlawfirm.com
Website: www.dgdlawfirm.com

June 19, 2012

Via Email: partyadmin@dentongop.org and CMRRR #7011 0470 0001 0149 3046

Ms. Dianne Edmondson
Denton County GOP Chairman
Denton County Republican Party
1400 N. Corinth St., Suite 106
Corinth, Texas 76208

Re: Ron Simmons, Candidate for State Representative, District 65

Dear Ms. Edmondson:

On behalf of Ron Simmons, I need to make a request of you in light of some correspondence my client received from the Federal Election Commission (FEC) (enclosed). The FEC has written to us regarding a payment made to the Denton County Republican Party for my client and his guests to attend the Lincoln-Reagan Day dinner. The check for this event was written to the "Denton GOP," a copy of which is also enclosed.

According to the FEC reports, Mr. Simmons' campaign is shown making contributions of \$2500 and \$25 to the Denton County Republican Party Victory Fund which would then potentially require his local, state representative campaign to file as a political committee. Since we do not believe he has to do so, in accordance with the directions provided by the FEC, we request that the funds be transferred to a non-federal account.

Thank you in advance for your assistance in this matter and please do not hesitate to contact me if you have any questions or need further information.

Sincerely,


Donna García Davidson

DGD/dr
Enclosures
cc: Ron Simmons

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SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

FOR LINE NUMBER: PAGE 66 OF 97
(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
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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)
DENTON COUNTY REPUBLICAN VICTORY FUND

A. Parker Campaign

Full Name (Last, First, Middle Initial)
Mailing Address PO Box 271741

City Flower Mound	State TX	Zip Code 75027
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FEC ID number of contributing federal political committee. **C**

Name of Employer Occupation

Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
1250.00

Date of Receipt
MM / DD / YYYY
03 / 15 / 2012
Transaction ID : SA11C.7444

Amount of Each Receipt this Period
1250.00

B. Ronald Simmons Campaign

Full Name (Last, First, Middle Initial)
Mailing Address 805 Lady of the Lake

City Lewisville	State TX	Zip Code 75056
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FEC ID number of contributing federal political committee. **C**

Name of Employer Occupation

Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
2500.00

Date of Receipt
MM / DD / YYYY
01 / 09 / 2012
Transaction ID : SA11C.7483

Amount of Each Receipt this Period
2500.00

C. Ronald Simmons Campaign

Full Name (Last, First, Middle Initial)
Mailing Address 805 Lady of the Lake

City Lewisville	State TX	Zip Code 75056
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FEC ID number of contributing federal political committee. **C**

Name of Employer Occupation

Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
2525.00

Date of Receipt
MM / DD / YYYY
03 / 19 / 2012
Transaction ID : SA11C.7454

Amount of Each Receipt this Period
25.00

SUBTOTAL of Receipts This Page (optional).....▶	3775.00
TOTAL This Period (last page this line number only).....▶	

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View Check Images (Front Only)

**RONALD E SIMMONS
CAMPAIGN FUND**
LEWISVILLE, TX 75058-6720

1002
32-96/1110
01

1-6-12
Date

Pay to the Order of Denton GDA \$ 2500.00

Two thousand five hundred & no Dollars

NORTH DALLAS BANK & TRUST CO.
For Sierra Lincoln Drive Ronald Simmons



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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input checked="" type="checkbox"/> USPS Registered/Certified	Postmarked (R/C) 6/19/12
<input type="checkbox"/> USPS Priority Mail Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	Postmarked
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify): Next Business Day Delivery <input type="checkbox"/>	Shipping Date
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked


PREPARER

6/25/12
DATE PREPARED

12050825947