

Copy

THE HEIKKINEN LAW FIRM, P.C.

110 NORTH MICHIGAN AVENUE  
HOWELL, MICHIGAN 48843

ARTHUR HEIKKINEN  
RICHARD A HEIKKINEN

(517) 546-1434  
FAX (517) 546-6775

March 20, 2000

Lawrence Noble  
Office of the General Counsel  
Federal Election Commission  
999 E. Street, N.W.  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAR 21 4 04 PM '00

Re: MUR 4984

Dear Mr. Noble:

My client, F.H. & L. Development, Inc., who does business as Lake Pointe Manor has received a letter from the Federal Election Commission dated March 13, 2000 from John R. Velasquez, Jr.

It is my understanding that the complaint pertains to alleged violations of the Federal Election Campaign Act by Michael J. Rogers and others. The complaint alleges that illegal corporate contributions were made by Lake Pointe Manor. Apparently the complaint arises out of the "Schedule B" to Mr. Roger's campaign report wherein Lake Pointe Manor was listed as making an inkind contribution in the amount \$5,742.16 on November 13, 1999.

On November 13, 1999 Jerry Spitler Brighton Ford Promotions held a banquet at Lake Pointe Manor in Geona Township. The total cost of the banquet was \$29,667.20. The entire cost of the banquet was paid by checks received from Brighton Ford Mercury, Inc. A deposit in the amount of \$2,000.00 was paid to Lake Pointe Manor on February 17, 1999. A second payment was made in the amount of \$15,600.00 on November 8, 1999. A third payment was made in the amount of \$12,474.60 on November 9, 1999. Because of the total of the payments made exceeded the cost of the banquet, Lake Pointe Manor issued a refund check in the amount of \$407.40 to Brighton Ford Mercury, Inc. on November 15, 1999.

F. H. & L. Development, Inc., d/b/a Lake Pointe Manor did not at any time make donations of any kind to the Rogers for Congress campaign. All costs of the banquet were paid by Brighton Ford Mercury, Inc.

I am enclosing herewith a completed Statement of Designation of Counsel. Also I am enclosing an Affidavit signed by Richard Luce the manager of Lake Pointe Manor.

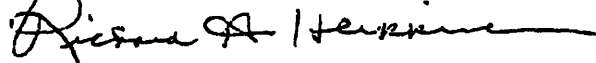
21-19-025-0311

Lawrence Noble  
March 20, 2000  
Page 2

I expect that after examination of the facts you will agree that my client did not commit a violation of the Federal Election Campaign Act. Please advise me whether or not you will require additional information.

Very truly yours,

THE HEIKKINEN LAW FIRM, P.C.



Richard A. Heikkinen

RAH/nb  
Enclosure

21.19.025.0312

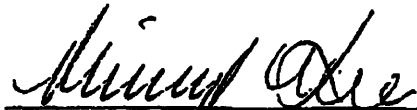
AFFIDAVIT

STATE OF MICHIGAN ]  
]ss  
COUNTY OF LIVINGSTON ]

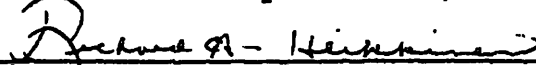
Richard Luce, being first duly sworn, deposes and says as follows:

1. Richard Luce was at all times pertinent hereto the manager of Lake Pointe Manor, a banquet facility located in Genoa Township, Livingston County, State of Michigan.
2. F. H. & L. Development, Inc. is a Michigan Corporation doing business under the assumed name of Lake Pointe Manor.
3. On November 13, 1999 Jerry Spitler Brighton Ford Promotions held a banquet at Lake Pointe Manor in Genoa Township. The total cost of the banquet was \$29,667.20. The entire cost of the banquet was paid by checks received from Brighton Ford Mercury, Inc. A deposit in the amount of \$2,000.00 was paid to Lake Pointe Manor on February 17, 1999. A second payment was made in the amount of \$15,600.00 on November 8, 1999. A third payment was made in the amount of \$12,474.60 on November 9, 1999. Because of the total of the payments made exceeded the cost of the banquet, Lake Pointe Manor issued a refund check in the amount of \$407.40 to Brighton Ford Mercury, Inc. on November 15, 1999.
4. Attached to this affidavit are duplicates of the invoice issued to Jerry Spitler Brighton Ford Promotions.
5. Attached to this affidavit are photocopies of the checks referred to in paragraph 3 hereinabove.
6. F. H. & L. Development, Inc., d/b/a Lake Pointe Manor did not at any time make any inkind donations to the Rogers for Congress campaign. All costs of the banquet were paid by Brighton Ford Mercury, Inc.

Further, deponent sayeth not.

  
Richard Luce

Subscribed and sworn to before me this 20th day of March, 2000.

  
Richard A. Heikkinen - Notary Public  
Livingston County, Michigan  
My commission expires: 10/24/01

21-19-025-0313

**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 4984

**NAME OF COUNSEL:** Richard A. Heikkinen

**ADDRESS:** 110 North Michigan Avenue

Howell MI 48843

**TELEPHONE:** (517) 546-1434

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

F.H. & L. DEVELOPMENT, INC.

March 2000  
**Date**

By:   
**Signature** Gregory F. Ford  
Its Secretary/Treasurer

**RESPONDENT'S NAME:** F.H. & L. Development, Inc., d/b/a Lake Pointe Manor

**ADDRESS:** 5768 E. Grand River

Howell MI 48843

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

**BUSINESS PHONE:** (517) 545-1000

21-19-025-0314

Lake Pointe Manor

5768 East Grand River  
Howell, MI 48843

# Invoice

DATE	INVOICE #
10/15/1999	231

<b>BILL TO</b>
Jerry Spittler Brighton Ford Promotions 8240 W. Grand River Brighton MI 48116
Date of Event November 13th 1999

21.19.025.0315

P.O. NO.	TERMS	PROJECT

QUANTITY	DESCRIPTION	RATE	AMOUNT
400	Dinner Buffet Package "B" Sliced Beef Tenderloin in Gravy, Herb Roasted Chicken, Baked Ziti w/Marinara Sauce, Au Gratin Potatoes, Green Bean Medley with E.B. Carrots, Garden Tossed Salad, Fresh Baked Rolls and Butter. Coffee and Hot Tea	21.95	8,780.00T
400	Appetizers: Fresh Cut Vegetable Display Domestic and Imported Cheese and Cracker Display Assorted Chips and Dips	3.00	1,200.00T
400	Desert Table	4.75	1,900.00T
400	Premium Bar Service	28.50	11,400.00T
	Gratuity @ 18%	4,190.40	4,190.40
400	Hall Rental Fee	2.00	800.00
	Old Down Payment	-15,600.00	-15,600.00
	Sales Tax	6.00%	1,396.80

Approximate Head Count	<b>Total</b>	\$14,067.20
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CHECK CONTROL NO. 47487

ISSUED BY: FAYE MCKIMMY

Brighton Ford-Mercury, Inc.  
8240 W. Grand River P.O. Box 2008  
Brighton, Mich. 48114

PAGE 1

INVOICE STOCK NO.	INVOICE DATE	PURCHASE ORDER NO.	COMMENT/V.I.N.	AMOUNT	DISCOUNT/ACCOUNT NO.	NET AMOUNT
	021799		24260			2,000.00
				47487	10070	-2,000.00
					24260	2,000.00
				TOTAL	10070	2,000.00

DEPOSIT.  
- \$ 1592<sup>60</sup>  
\$ 407<sup>40</sup> REFUND.

21-19-025-0316

DETACH AT PERFORATION BEFORE DEPOSITING CHECK

REMITTANCE ADVICE

THE BACK OF THIS CHECK CONTAINS AN ARTIFICIAL WATERMARK, HOLD AT AN ANGLE TO VIEW



BRIGHTON FORD MERCURY, INC.  
8240 W. Grand River, P.O. Box 2008  
Brighton, Michigan 48114



47487 47487

DATE  
17FEB99

PAY THIS AMOUNT  
\*\*\*\*\*2,000 DOLLARS 00 CENTS

AMOUNT OF CHECK  
\*\*\*\*\*2,000.00

BRIGHTON FORD MERCURY, Inc.

TO THE ORDER OF

LAKE POINTE MANOR  
5768 EAST GRAND RIVE  
HOWELL MI 48843

BY

*[Signature]*  
AUTHORIZED SIGNATURE



**FORD  
MERCURY**

BRIGHTON FORD MERCURY, INC.  
8240 W. Grand River, P.O. Box 2006  
Edginton, Michigan 48114



NATIONAL BANK OF  
DETROIT-OAKWOOD

60236 741282774

60236

DATE  
08NOV/99

PAY THIS AMOUNT  
\*\*\*\*\*12,474 DOLLARS 60 CENTS

AMOUNT OF CHECK  
\*\*\*\*\*12,474.60

TO  
THE  
ORDER  
OF

LAKE POINTE MANOR  
5768 EAST GRAND RIVER  
HOWELL MI 48843

BRIGHTON FORD MERCURY, Inc.

BY *John McKeown*  
AUTHORIZED SIGNATURE

7130-520-61-12

FORD  
MERCURY

18OCT99

BRIGHTON FORD MERCURY, INC.  
8240 W. Grand River, P.O. Box 200  
Bloomington, Michigan 48104

NATIONAL BANK OF  
DETROIT

\*\*\*\*\*15,600

DOLLARS

00

CENTS

\*\*\*\*\*15,600.00

59260

TO: THE  
ORDER OF: LAKE-POINTE MANOR  
5768 EAST GRAND RIVER  
HOMELL, MI 48843

BY

*[Signature]*  
BRIGHTON FORD-MERCURY, Inc.  
AUTHORIZED REPRESENTATIVE

BTLD"520"BT"12