

DEMOCRATIC  
CONGRESSIONAL  
CAMPAIGN COMMITTEE

Hon. Patrick J. Kennedy, RI  
Chairman

August 2, 2000

Hon. Charles B. Rangel, NY  
Co-Chair, Voter Participation

Hon. Frank Pallone, Jr., NJ  
Co-Chair, Finance

Hon. Ellen O. Tauscher, CA  
Co-Chair, Member Participation

Lawrence Noble, Esq.  
General Counsel  
Federal Election Commission  
999 E Street, N.W., 6th Floor  
Washington, D.C. 20463

MUR 5062

AUG 2 11 28 AM '00

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Dear Mr. Noble:

This complaint asserts that Rich Rodriguez, Friends and Farmers for Rich Rodriguez for Congress Committee, Craig A. Boone as Treasurer, Arval Legal Services, Danell Bros., E&B Landscape, Gilkey Enterprises, Grapery, GWF Power Systems, Manzanillo Ranch, Orosi Swap Meet, Overland Stockyards, Panoche Ginning Company, Quick Signs, Schaller Bail Bonds, Sierra Vista Pharma, Tiemersa Dairy, Tree Panoche Land Co., Triple B Farms, Verdegaal Brothers, Western Building Properties Ass'n, Westside Chemical Co., Willemina Dairy, Gregory Schneider and Peggy Stefanopoulos violated the Federal Election Campaign Act (the "Act"), 2 U.S.C. §§ 431 et seq., and related regulations of the Federal Election Commission ("FEC" or the "Commission"), 11 C.F.R. §§ 100.1 et seq.

Rodriguez has received a series of illegal contributions from corporations, individuals who exceeded their \$1,000 limit, and he has repeatedly failed to disclose legally required information about his donors. The Commission should immediately investigate his flagrant violations.

**DISCUSSION**

Rodriguez is a Republican candidate for the U.S. House of Representatives in California's 20th District. Since at least January 1 of this year, his campaign has been systematically violating the Act. Rodriguez has accepted thousands of dollars in illegal contributions and flouted the Act's disclosure requirements.

430 SOUTH CAPITOL STREET • WASHINGTON, D.C. 20003 • (202) 863-1500 • [www.takebackthehouse.com](http://www.takebackthehouse.com)

CONTRIBUTIONS TO THE DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE ARE NOT TAX DEDUCTIBLE

Paid for by the DCCC. The DCCC is a multi-candidate Committee.

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**A. Illegal Corporate Contributions**

The Act makes it illegal "for any corporation whatever" to contribute to Federal candidates. 2 U.S.C. § 441b(a) (2000). Nonetheless, Rodriguez accepted as many as 21 illegal corporate contributions between February and June. These contributions include:

2/15/2000	Western Building Properties Ass'n	\$500
2/22/2000	Orosi Swap Meet	\$250
2/22/2000	Quick Signs	\$500
2/22/2000	Schaller Bail Bonds	\$200
3/28/2000	Manzanillo Ranch	\$500
3/28/2000	Triple B Farms	\$250
3/31/2000	Panoche Ginning Company	\$500
3/31/2000	Tree Panoche Land Co.	\$1,000
4/13/2000	Westside Chemical Co.	\$200
4/18/2000	Grapery	\$200
5/1/2000	Orosi Swap Meet	\$600
6/17/2000	Arval Legal Services	\$200
6/17/2000	E&B Landscape	\$200
6/22/2000	Danell Bros.	\$200
6/27/2000	Sierra Vista Pharma	\$200
6/29/2000	GWF Power Systems	\$200
6/30/2000	Gilkey Enterprises	\$500
6/30/2000	Overland Stockyards	\$200
6/30/2000	Tiemersa Dairy	\$200
6/30/2000	Verdegaal Brothers	\$400
6/30/2000	Willemina Dairy	\$1,000

Several of these entities are registered as corporations with the California Secretary of State. (See Attachment A.) Rodriguez's failure to attribute any of the other contributions to individuals proves their illegality. Had Rodriguez received them from eligible partnerships or limited liability companies, he would have had to attribute them among individual contributors. See 11 C.F.R. §§ 110.1(e) (partnerships), 110.1(g)(5)

21.19.025.0708

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(limited liability companies).<sup>1</sup> Had he received any of them from unincorporated sole proprietorships, he would have reported them as coming from the individuals who owned the companies. Yet none of these contributions are attributed at all.

#### **B. Illegal Excessive Contributions From Individuals**

The Act limits contributions from individuals to Federal candidates to \$1,000 per candidate per election. 2 U.S.C. § 441a(a)(1)(A). While a campaign may request an individual to reattribute part of an excessive contribution to a spouse or redesignate it for another election, it must also inform the individual that the contribution may be refunded, and it must receive a signed redesignation or reattribution within 60 days of the original contribution. 11 C.F.R. §§ 110.1(b)(5)(ii), 110.1(k)(3)(ii). If the campaign does not obtain a signed redesignation or reattribution within 60 days of its original receipt, it must refund the contribution. Id. § 103.3(b)(3).

Rodriguez illegally received excessive contributions from two individuals without obtaining proper redesignations or reattributions. He received two \$1,000 checks for the primary election on January 9 from Gregory Schneider. He has not redesignated, reattributed or refunded the illegal \$1,000 portion.

He also received \$2,000 for the general election from Peggy Stefanopoulos on March 20. While the campaign purported to redesignate the excessive \$1,000 to the primary election, that election had already passed when the original contribution was made, and Rodriguez had no net debts outstanding for the primary. As a result, Ms. Stefanopoulos's contribution remains illegal. See 11 C.F.R. § 110.1(b)(3)(iii).

#### **C. Illegal Failure to Disclose Required Information**

The Act requires campaigns to report the name, mailing address, occupation and name of employer of all individuals who give more than \$200 in a calendar year.

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<sup>1</sup> In fact, Rodriguez received three contributions from entities that he purports to be partnerships, but which are not attributed to any individual partners. These contributions were from F&T Farms (June 22, \$1,000), A.J. Carvalho & Sons (April 18, \$250) and Coelho West (April 18, \$1,000). By failing to attribute these contributions -- assuming they were, in fact, from partnerships - Rodriguez has further violated the Act. See 11 C.F.R. § 110.1(e).

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See 2 U.S.C. §§ 431(13)(A), 434(b)(3)(A). Moreover, it requires campaigns to use their "best efforts" to collect and report this information. See 11 C.F.R. § 104.7.

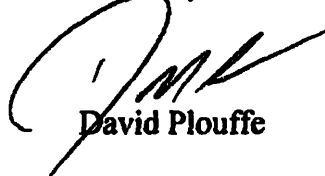
According to the nonpartisan Center for Responsive Politics, Rodriguez fully identified only 72% of his contributors. (See Attachment B) This record is woefully inferior not only to that of his opponent, who has a 96% record, but also to that of the two major party Presidential candidates, both of whom have records above 80%. (See Attachment C) It is clear that Rodriguez has not bothered to make the "best efforts" that the law requires.

### CONCLUSION

Rodriguez has plagued the electorate with these incessant violations throughout the 2000 calendar year. Consequently, there is every reason to believe that these serious violations will continue. In fact, they may only worsen, as Rodriguez finds himself increasingly pressured to win at any cost.

Accordingly, the Commission should take swift action to remedy these violations, and seek an injunction so that they never recur.

Sincerely,



David Plouffe

Executive Director, Democratic  
Congressional Campaign Committee

0120-520-61-12

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STATE OF Washington )  
County of D.C. )

SUBSCRIBED AND SWORN to before me this 2nd day of Aug, 2000.

Mable Hume  
Notary Public

My Commission Expires:

My Commission Expires October 11, 2001

21-19-025-0711  
1120-520-61-72

A

## Corporations registered with the California Secretary of State

Corporation		
QUICK SIGNS, INC.		
Number: C1564089	Date Filed: 10/24/1989	Status: active
Jurisdiction: California		
Mailing Address		
PO BOX 21		
FALLBROOK, CA 92088		
Agent for Service of Process		
R E DELEON		
PO BX 21		
FALLBROOK, CA 92088		

Corporation		
PANOCHE GINNING COMPANY, INC.		
Number: C0920920	Date Filed: 6/4/1979	Status: suspended
Jurisdiction: California		
Mailing Address		
43890 W. NORTH AVE		
FIREBAUGH, CA 93622		
Agent for Service of Process		
EDWARD WANDEZELL		
43890 W. NORTH AVE		
FIREBAUGH, CA 93622		

Corporation		
WESTSIDE CHEMICAL COMPANY		
Number: C0395253	Date Filed: 4/27/1960	Status: active
Jurisdiction: California		
Mailing Address		
P.O. BOX 7		
MENDOTA, CA 93640		
Agent for Service of Process		
CHARLES A. SORENSEN		
101 N. SORENSEN		
MENDOTA, CA 93640		

Corporation		
E & B LANDSCAPE AND GARDEN SUPPLIES, INC		
Number: C1919971	Date Filed: 1/3/1995	Status: active

<b>Jurisdiction:</b> California		
<b>Mailing Address</b>		
12319 - 12TH AVENUE		
HANFORD, CA 93230		
<b>Agent for Service of Process</b>		
EDWARD COSTA		
12319 - 12TH AVENUE		
HANFORD, CA 93230		

<b>Corporation</b>		
DANELL BROS., INC.		
<b>Number:</b> C0751710	<b>Date Filed:</b> 8/5/1975	<b>Status:</b> active
<b>Jurisdiction:</b> California		
<b>Mailing Address</b>		
8265 HANFORD-ARMONA RD		
HANFORD, CA 93230		
<b>Agent for Service of Process</b>		
MARIGAIL DANELL		
8265 HANFORD-ARMONA ROAD		
HANFORD, CA 93230		

<b>Corporation</b>		
GWF POWER SYSTEMS COMPANY, INC.		
<b>Number:</b> C1298697	<b>Date Filed:</b> 2/11/1986	<b>Status:</b> active
<b>Jurisdiction:</b> California		
<b>Mailing Address</b>		
4300 RAILROAD AVENUE		
PITTSBURG, CA 94565		
<b>Agent for Service of Process</b>		
DUANE H NELSEN		
4300 RAILROAD AVENUE		
PITTSBURG, CA 94565		

<b>Corporation</b>		
OVERLAND STOCK YARDS		
<b>Number:</b> C0378080	<b>Date Filed:</b> 6/24/1959	<b>Status:</b> active
<b>Jurisdiction:</b> California		
<b>Mailing Address</b>		
10565 9TH AVE		
HANFORD, CA 93230		
<b>Agent for Service of Process</b>		
PETER BELEZZUOLI		
10565 9TH AVE		
HANFORD, CA 93230		

<b>Corporation</b>		
VERDEGAAL BROS., INC.		
<b>Number:</b> C0729052	<b>Date Filed:</b> 1/7/1975	<b>Status:</b> active
<b>Jurisdiction:</b> California		
<b>Mailing Address</b>		
13555 S. 11TH AVENUE		
HANFORD, CA 93230		
<b>Agent for Service of Process</b>		
STEVEN COBB		
311 NORTH DOUTY STREET		
HANFORD, CA 93230		



HOME PRESIDENTIAL RACE CONGRESSIONAL RACES DONOR LOOKUP PACS SOFT MONEY LOBBYISTS SEARCH  
WHAT'S NEW NEWS AND ISSUES STATES POLITICIANS LINKS PUBLICATIONS ABOUT US DROP OPEN SECRETS

## SUMMARY DATA:

Total Raised  
Quality of Disclosure

## GEOGRAPHIC DATA:

In- vs. Out-of-State  
Top Metro Areas  
Top Zip Codes

## INTEREST GROUPS:

Business / Labor /  
Ideological Split  
In PAC Contributions  
Sector Totals  
Top Industries  
Top Contributors  
Percent Coded

## INCUMBENT PROFILE

1998 ELECTION

CALIFORNIA

PICK ANOTHER RACE

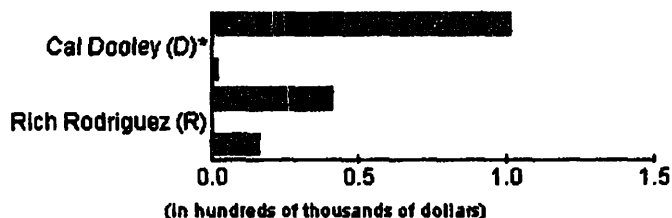
CONTACT US:  
feedback@crp.org

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## Quality of Disclosure

## 2000 RACE: CALIFORNIA DISTRICT 20



**FULL DISCLOSURE:** Includes full name and occupation / employer

**INCOMPLETE DISCLOSURE:** Occupation listed gives no indication what the person does for a living. Examples of unacceptably vague disclosures are such "occupations" as "businessman," "entrepreneur," "self-employed," and "executive".

**NO DISCLOSURE:** No information about the donor's employer and / or occupation was listed.

**HOW TO READ**  
Federal election that all contribute than \$200 be its donor's name, a occupation and disclosed. Most identify the greater their donors' occupations employers - an if voters are to s interests giving t The chart at left of disclosure of occupations and each candidate

In the 1996 elec average membe fully identified 91 contributors' occ employers. Seve occupations wer the rest were inc

**METHODOLOGY:** T page are calculated of more than \$200 fr reported by the cand Federal Election Co dollars are not includ

**NOTE:** All the numb for the 1995-2000 S based on Federal El data released on Ju to distribute or cite t please credit the Ce Politics.

Candidate	Full	Incomplete	None
Cal Dooley (D) *	\$101,656 96%	\$2,000 2%	\$2,750 3%
Rich Rodriguez (R)	\$41,749 72%	\$0 -	\$16,400 28%
Arnold Kriegbaum (L)	No reports on record for this candidate.		
Walter Ruehlig (3)	No reports on record for this candidate.		

\* Incumbent



HOME PRESIDENTIAL RACE CONGRESSIONAL RACES DONOR LOOKUP PACS SOFT MONEY LOBBYISTS SEARCH  
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## ALL CANDIDATES

Total Raised  
Source of Funds  
Disclosure Quality  
Geographic Totals  
Sector Totals  
Selected Industries  
Top Industries  
Top Contributors  
Donor Lookup  
Other Data

## PRESS RELEASES

McCain's Donors  
(2/17/00)  
Bigger Bundles  
(11/4/99)  
Bush Dominates  
(7/27/99)  
Bundles Proliferate  
(7/22/99)  
Disclosure Improves  
(7/16/99)  
Lawyers Top Donors  
(4/27/99)

## POLITICIANS HOME

## PRIMARY DATES

## FORMAT TO PRINT

[opensecrets.org](http://www.opensecrets.org)



## 2000 PRESIDENTIAL RACE

## Quality of Disclosure

(How to read this chart / methodology)

NOTE: All the numbers are for the 1999-2000 and based on Federal Election Commission data 2000. Feel free to use this material, but please credit the Center for Responsive Politics.

## George W. Bush



■ Full Disclosure	\$68,671,843	(89.3%)
■ Incomplete	\$469,519	(.6%)
■ No Disclosure	\$7,768,445	(10.1%)

## Al Gore



■ Full Disclosure	\$24,845,808	(81.0%)
■ Incomplete	\$1,475,985	(4.8%)
■ No Disclosure	\$4,345,420	(14.2%)

## Pat Buchanan



■ Full Disclosure	\$918,976	(46.1%)
■ Incomplete	\$25,135	(1.3%)
■ No Disclosure	\$1,048,264	(52.6%)

## Ralph Nader



■ Full Disclosure	\$319,487	(81.1%)
■ Incomplete	\$4,250	(1.1%)
■ No Disclosure	\$70,081	(17.8%)

## Harry Browne



■ Full Disclosure	\$288,623	(85.7%)
■ Incomplete	\$2,500	(.7%)
■ No Disclosure	\$45,653	(13.6%)