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August 29, 2000

VIA FEDERAL EXPRESS

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

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
AUG 31 10 39 AM '00

Re: MUR 5062 -- GWF Power Systems Company, Inc.

Dear Ms. Smith:

This firm represents GWF Power Systems Company, Inc. ("GWF") concerning MUR 5062. (A copy of the Statement of Designation of Counsel is enclosed.) GWF received your letter concerning this matter on August 15, 2000. We request that the FEC take no action against GWF for the reasons stated below.

The complaint filed by the Democratic Congressional Campaign Committee against Rich Rodriguez, Friends and Farmers for Rich Rodriguez for Congress Committee (the "Committee"), and, among others, GWF, accurately states that GWF made a \$200 contribution to the Friends and Farmers for Rich Rodriguez for Congress Committee by check, dated June 26, 2000. This contribution was initiated by an employee who works at a subsidiary of GWF and who was unfamiliar with the federal election campaign laws. The subsidiary in question, Hanford L.P., is a limited partnership, and the employee mistakenly believed that partnerships could contribute to federal election campaigns. As soon as this mistake was discovered, GWF took steps to obtain a full refund of its contribution from the Committee. GWF received the refund on August 25, 2000 (a copy of the refund check is enclosed).

We respectfully request that you take no further action in this matter with respect to GWF based on the fact that the contribution has been refunded, there was no intent to violate the law, and the amount of the contribution was very small. The contribution at issue was an isolated mistake; GWF has no prior record of federal campaign law violations. Moreover, GWF has implemented new procedures to ensure compliance with the federal campaign laws. For example, prior approval by GWF headquarters is now required for all campaign contributions

Alva E. Smith  
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made by GWF. Considering all these factors, it would serve no public purpose for the Federal Election Commission to use staff resources to continue to pursue this matter.

We appreciate your consideration of this letter. If you have any questions, please do not hesitate to contact me.

Very truly yours,

*Kathryn E. Donovan*

Kathryn E. Donovan

Enclosure

cc: Mr. Duane H. Nelsen

Mr. F. K. Lowell

## STATEMENT OF DESIGNATION OF COUNSEL

MUR 5062NAME OF COUNSEL: Kathryn E. DonovanFIRM: Pillsbury Madison & Sutro LLPADDRESS: 400 Capitol Mall, Suite 1700Sacramento, CA 95814TELEPHONE: ( 916 ) 329-4714FAX: ( 916 ) 441-3583

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.

8-29-00  
Date

Catherine L. Edwards  
Signature  
Corporate Secretary/Treasurer  
GWF Power Systems Company, Inc.

RESPONDENT'S NAME: GWF Power Systems Company, Inc.ADDRESS: 4300 Railroad AvenuePittsburg, CA 94565-6006TELEPHONE: HOME ( 510 ) 522-8678BUSINESS ( 925 ) 431-1441

Aug 31 2 48 PM '00

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OFFICE OF GENERAL

FRIENDS & FARMERS FOR  
RICH RODRIGUEZ  
FOR CONGRESS  
PO BOX 11127  
FRESNO, CA 93771

1182

11-35/1510  
1289

Date 8/23/89

Pay to the  
Order of

GW F Power Systems

\$ 200.00

Two hundred and

no Dollars

**Bank of America**  
Shaw - Westgate Branch #1289  
5411 West Shaw Avenue  
Fresno, CA 93711 (208) 488-2251

For \_\_\_\_\_

*[Signature]*

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