

Pillsbury



Madison &
Sutro LLP

Writer's direct dial number / email:
(916) 329-4714
donovan_ke@pillsburylaw.com

RECEIVED
FEC MAIL ROOM

2000 AUG 30 P 3:31

ATTORNEYS AT LAW
400 CAPITOL MALL, SUITE 1700
SACRAMENTO, CALIFORNIA 95814-4419
TELEPHONE: (916) 329-4700 FAX: (916) 441-3583
Internet: pillsburylaw.com

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

00. MM 30 13 AUG

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
August 29, 2000
Page 2

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. Nielsen

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) 431-1441RECEIVED
FEDERAL ENERGY
REGULATORY
COMMISSION
MAIL ROOM

AUG 31 2 48 PM '00

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

Date 8/23/00

1182
11-31/1210
1200

Pay to the
Order of GW Power Systems \$ 200.00
Two hundred and 100 Dollars 00

 Bank of America
Shaw • Westgate Branch #1269
3411 West Shaw Avenue
Fresno, CA 93711 (209) 488-2251

For

10121000358101182101269000463811

