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**Admitted in California only*

September 14, 2000

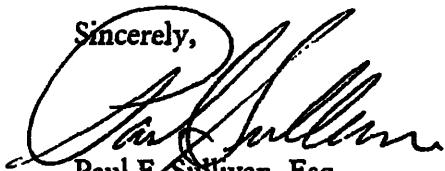
Jeff S. Jordan, Esquire
Supervisory Attorney
Central Enforcement Docket
Federal Elections Commission
999 E Street, N W
Washington, DC 20463

Re: MUR 5062

Dear Mr. Jordan:

Enclosed please find a copy of the Response to Complaint in the above captioned MUR that I filed today.

If you should have any questions, please do not hesitate to contact me.

Sincerely,

Paul E. Sullivan, Esq.
For the firm

Enclosure

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FEDERAL ELECTION
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BEFORE THE FEDERAL ELECTION COMMISSION

IN RE:

Friends and Farmers for Rich
Rodriguez for Congress Committee

MUR 5062

Response To Complaint

I. INTRODUCTION

In accordance with the provisions of the Federal Election Campaign Act of 1971, as amended, ("FECA" or "Act") this response is filed pursuant to 2 U.S.C. § 437g(a)(1) on behalf of Friends and Farmers for Rich Rodriguez for Congress Committee ("Respondent") in the above referenced matter. The Complaint alleges potential violations by a variety of entities, however, this Response is filed only on behalf of the above named Respondent.

Based upon the legal and factual arguments presented herein, the Respondent hereby requests that the Commission make a finding of No Reason to Believe and close this matter.

II. ALLEGATIONS AND FACTUAL SUMMARY

A. Questionable Evidence in Complaint

This matter was generated as a result of a Complaint filed by David Plouffe, the Executive Director of the Democratic Congressional Campaign Committee ("DCCC"). ("Complaint") a copy of which is attached at Exhibit 1. The political purpose of this complaint is rather transparent, however, what is uniquely disturbing to Respondent, and should be to the Commission, is the lack of evidence for the claims that are made in the Complaint. The Complaint at page 2 states, "Nonetheless, Rodriguez accepted as many as 21 illegal corporate

contributions between February and June. These contributions include:" --- the 21 entities are then listed.

Not one of the names for those 21 entities listed, shows any indicia that they are a corporation. The Complaint acknowledges and therefore evidences that due to the lack of this corporate indicia, a review of their status was made, presumably by the DCCC, with the corporate registration division of the California Secretary of State's office. At page 2 of the Complaint immediately after the listing of the 21 entities it states, "Several of these entities are registered as corporations with the California Secretary of State. (See Attachment A.)" Attachment "A" contains the corporate status records of eight (8) records of the entities. Clearly, all the 21 names were reviewed with the Secretary of State's office but only eight (8) were identified as corporate entities. The question for the Commission to consider is why the other 13 entities were listed in the Complaint, a document signed under oath, when the DCCC had evidence that those groups were in fact not corporations. This abuse of the FEC complaint process should not go without reprimand. Respondent is considering available courses of action but this is a matter that should be addressed by the Commission directly to the DCCC.

B. Allegations of Complaint

The Complaint alleges the following:

First, that Respondent received twenty-one (21) contributions from corporations in violation of 2 U.S.C. § 441(b)(a).

Second, that Respondent received contributions from individuals in excess of the \$1,000 limit in violation of 2 U.S.C. § 441a(a)(1)(A).

Third, that the Respondent accepted excessive contributions from two individuals without obtaining redesignations or reattributions within sixty (60) days as required by 11 C.F.R. § 103.3(b)(3).

Fourth, that Respondent failed to fulfill its "best efforts" requirements for contributions to Respondent.

III. ARGUMENT

A. Summary of Applicable FEC Regulations

Corporations are prohibited from making contributions federal committees by 2 U.S.C. § 441(b)(a). Consequently, the FECA requires a committee treasurer to review contributions to determine if they are from a prohibited source such as a corporation. (11 C.F.R. § 103.3(b)). If the face of the contribution instrument indicates a genuine question as to whether the contribution is from a corporation, the FECA provides alternative options for compliance.. First, the committee is authorized to deposit the contribution into the committee's bank depository pending verification of its legality. (11 C.F.R. § 103.3(b)(4)). Second, the committee has the option of returning the contribution. (11 C.F.R. § 103.3(b)(1)). The Respondent utilized the first option in developing its compliance system.

The Regulations require that the questionable contributions be maintained in a separate account, so as not to be available for use by the committee. 11 CFR 103.3 (b)(4). At that point, the treasurer is responsible for obtaining information to evidence the legality of the contribution. (11 C.F.R. § 103.3(b)(1)). This evidence may be in the form of a written statement from the contributor or a written statement memorializing an oral communication confirming the legality of the contribution. "The treasurer shall make at least one written or oral request for evidence of the legality of the contribution." (11 C.F.R. § 103.3(b)(1)). At the end of that thirty (30) day

period, the committee must have received confirmation that the contribution is not drawn from corporate funds or issue a refund check. "If the contribution cannot be determined to be legal, the treasurer shall, within thirty days of the treasurer's receipt of the contribution, refund the contribution to the contributor." (11 C.F.R. § 103.3(b)(1) and (2)).

Respondent has adopted a fully integrated system in accordance with the FECA to comply with these and other FECA compliance requirements. For contributions from a questionable source this system include a standard letter sent by the Committee to the contributor to verify the legal status of the contributor. (A copy of this standard letter is attached at Exhibit 2). In accordance with 11 C.F.R. § 103.3, the Respondent has indicated it maintains a separate account to segregate those questionable contributions from the committee's permissible funds until such time as their legality is verified or refunded. When corporate contributions are discovered, they are refunded to the contributor with a letter notifying the contributor that Respondent is prohibited from accepting corporate contributions. (A copy of this standard letter is attached at Exhibit 3).

In summary, Respondent has instituted in accordance with the FECA and the Regulations a complete system to guard against the acceptance of prohibited funds, which includes:

1. A compliance review system,
2. Standard letters of inquiry,
3. Documentation to verify the status of the contributor,
4. Establishment of a segregated account to capture questionable contributions, and
5. A refund of contributions if they are determined to be prohibited.

With this compliance system in mind, we review the allegations in the Complaint.

B. Alleged Corporate Contributions. The Complaint alleges that Respondent accepted contributions from twenty-one (21) corporate entities. Set out below is a listing of those entities, the actions taken by Respondent to determine the permissibility of the contribution and the resolution of each such contribution. That record will show:

1. That but for a single minor contribution, all of the contribution instruments presented genuine questions on their face as to their legality under the FECA.
2. Documents were sent by Respondent in an attempt to verify the legal status of each of the questionable contributors.
3. Documents were received back from the contributors indicating the legal status of the entity or absent the return of the documents sent, the contributions were refunded.
4. The record will show that of the 21 entities,
 - a. Three (3) provided notification indicating they were corporations, and those contributions were refunded;
 - b. Three entities failed to return the notice and as a result, the contributions were refunded;
 - c. The fifteen other entities confirmed in writing that they were entities lawfully entitled to make contributions under the FECA

1. Western Building Properties Association (WBPA)

The Western Building Properties Association made a contribution of \$500 to Respondent

on February 16, 2000 which was never deposited by Respondent. (A copy of the check is attached at Exhibit 4). This contribution was mistakenly reported on the FEC report as coming from the Western Bowling Proprietors Association. The FEC report has since been amended to reflect this correction.

2. Orosi Swap Meet

The Orosi Swap Meet made two (2) contributions. The first contribution was made on February 21, 2000 in the amount of \$250. (A copy of the check is attached at Exhibit 5). The second contribution was made on March 26, 2000 in the amount of \$600. (A copy of the check is attached at Exhibit 6). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Orosi Swap Meet to determine its legal status. Respondent received notice from Orosi Swap Meet on July 28, 2000 confirming it to be a corporate entity. The Respondent issued a refund check in the amount of \$850 on July 28, 2000. (A copy of the check is attached at Exhibit 7).

3. Quick Signs

Quick Signs made a contribution of \$500 on February 21, 2000. (A copy of the check is attached at Exhibit 8). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Quick Signs to determine its legal status. Respondent received a response back from Quick Signs on April 27, 2000 confirming it to be a sole proprietor. (A copy of the letter is attached at Exhibit 9). Please note that Attachment A to the Complaint lists Quick Signs, Inc. based in Fallbrook, California as a corporation while Quick Signs, the entity making the contribution to Respondent is based in Fresno, California. (A copy

is attached at Exhibit 1). The Complainant had the address of the contributing entity and therefore sufficient notice that these were separate entities and Quick Signs should never have been included as a prohibited contributor in the Complaint.

4. Schaller Bail Bonds

Schaller Bail Bonds made a contribution of \$200 on February 21, 2000. (A copy of the check is attached at Exhibit 10). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Schaller Bail Bonds to determine its legal status. Respondent received a response back from Schaller Bail Bonds on May 1, 2000 confirming it to be a sole proprietor. (A copy of the letter is attached at Exhibit 11).

5. Manzanillo Ranch

The Manzanillo Ranch made a contribution of \$500 on March 27, 2000. (A copy of the check is attached at Exhibit 12). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Manzanillo Ranch to determine its legal status. Respondent received a response back from Manzanillo Ranch on June 8, 2000 confirming it to be a sole proprietor. (A copy of the letter is attached at Exhibit 13).

6. Triple B. Farms

Triple B. Farms made a contribution of \$250 on March 27, 2000. (A copy of the check is attached at Exhibit 14). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Triple B. Farms to determine its legal status.

Respondent received a response back from Triple B. Farms on April 19, 2000 confirming it to be a partnership. (A copy of the letter is attached at Exhibit 15).

7. Panoche Ginning Company

The Panoche Ginning Company made a contribution of \$500 on March 29, 2000. (A copy of the check is attached at Exhibit 16). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Panoche Ginning Company to determine its legal status. Respondent received a response back from Panoche Ginning Company on April 20, 2000 confirming it to be a partnership. (A copy of the letter is attached at Exhibit 17). Please note that Attachment A to the Complaint incorrectly lists the Panoche Ginning Company as a corporation. (A copy is attached at Exhibit 1).

8. Tres Panoche Land Co.

The Tres Panoche Land Co. made a contribution of \$1,000 on March 30, 2000. (A copy of the check is attached at Exhibit 18). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Tres Panoche Land Co. to determine its legal status. Respondent received a response back from Tres Panoche Land Co. on April 21, 2000 confirming it to be a partnership. (A copy of the letter is attached at Exhibit 19).

9. Westside Chemical Co.

The Westside Chemical Co. made a contribution of \$200 on April 12, 2000. (A copy of the check is attached at Exhibit 20). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Westside Chemical Co. to

determine its legal status. Respondent received a response back from Westside Chemical Co. on May 8, 2000 confirming it to be a partnership. (A copy of the letter is attached at Exhibit 21).

Please note that Attachment A to the Complaint incorrectly lists the Westside Chemical Co. as a corporation. (A copy is attached at Exhibit 1).

10. Grapery

The Grapery made a contribution of \$200 on April 14, 2000. (A copy of the check is attached at Exhibit 22). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Grapery to determine its legal status. Respondent received a response back from Grapery on May 8, 2000 confirming it to be a sole proprietor. (A copy of the letter is attached at Exhibit 23).

11. Arval Legal Services

Arval Legal Services made a contribution of \$200 on June 14, 2000. (A copy of the check is attached at Exhibit 24). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Arval Legal Services to determine its legal status. Respondent received a response back from Arval Legal Services on August 2, 2000 confirming it to be a sole proprietor. (A copy of the letter is attached at Exhibit 25).

12. E & B Landscape and Garden Supply

E & B Landscape and Garden Supply made a contribution of \$200 on June 15, 2000. (A copy of the check is attached at Exhibit 26). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to E & B Landscape and Garden

Supply to determine its legal status. The notice was not returned and the Respondent choose to refund the contribution on August 15, 2000. (A copy of the check is attached at Exhibit 27).

13. Danell Bros., Inc.

Danell Bros., Inc. made a contribution of \$200 on June 19, 2000. (A copy of the check is attached at Exhibit 28). Respondent promptly informed Danell Bros., Inc. in writing that it was unable to accept its corporate contribution and refunded the contribution on July 13, 2000. (A copy of the letter and check are attached at Exhibit 29).

14. Sierra Vista Pharmacy

Sierra Vista Pharmacy made a contribution of \$200 on June 21, 2000. (A copy of the check is attached at Exhibit 30). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Sierra Vista Pharmacy to determine its legal status. Respondent received a response back from Sierra Vista Pharmacy on July 12, 2000 confirming it to be a partnership. (A copy of the letter is attached at Exhibit 31).

15. GWF Power Systems, L.P.

GWF Power Systems, L.P. made a contribution of \$200 on June 26, 2000. (A copy of the check is attached at Exhibit 32). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to GWF Power Systems, L.P. to determine its legal status. Respondent received a response back from GWF Power Systems, L.P. on August 12, 2000 confirming it to be a corporate partnership. (A copy of the letter is attached at Exhibit 33). As a result, Respondent promptly informed GWF Power Systems, L.P. in writing

that it was unable to accept its corporate contribution and refunded the contribution on August 23, 2000. (A copy of the check is attached at Exhibit 34).

16. Gilkey Enterprises

Gilkey Enterprises made a contribution of \$500 on June 22, 2000. (A copy of the check is attached at Exhibit 35). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Gilkey Enterprises to determine its legal status. Respondent received a response back from Gilkey Enterprises on July 31, 2000 confirming it to be a partnership. (A copy of the letter is attached at Exhibit 36).

17. Overland Stockyards

Overland Stockyards made a contribution of \$200 on June 21, 2000. (A copy of the check is attached at Exhibit 37). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Overland Stockyards to determine its legal status. Not having received a response to that inquiry, the Respondent refunded the contribution on August 15, 2000. (A copy of the check is attached at Exhibit 38).

18. Tiemersma Dairy

Tiemersma Dairy made a contribution of \$200 on June 30, 2000. (A copy of the check is attached at Exhibit 39). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Tiemersma Dairy to determine its legal status. Respondent received a response back from Tiemersma Dairy on July 12, 2000 confirming it to be a partnership. (A copy of the letter is attached at Exhibit 40).

19. Verdegaal Bros.

Verdegaal Bros. made a contribution of \$400 on June 23, 2000. (A copy of the check is attached at Exhibit 41). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Verdegaal Bros. to confirm its status as a partnership. (A copy of the letter is attached at Exhibit 42). Not having received a timely response to that inquiry, Respondent elected to refund the contribution on August 15, 2000. Subsequently on August 30, 2000, Verdegaal Bros., returned the notice request indicating it was a partnership. (A copy of the check and the returned notice is attached at Exhibit 43).

20. Willemina Dairy

Willemina Dairy made a contribution of \$1,000 on June 29, 2000. (A copy of the check is attached at Exhibit 44). The face of the check does not indicate it is drawn on a corporate account nor that is an excessive contribution. In accordance with 11 C.F.R. § 103.3(b)(1), Respondent sent their standard written inquiry to Willemina Dairy to determine its legal status. Respondent received a response back from Willemina Dairy on August 9, 2000 confirming it to be a sole proprietor. (A copy of the letter is attached at Exhibit 45).

Summary

As demonstrated above, not only has Respondent put in place a compliance system to comply with FECA requirements, it has thoroughly executed these procedures. As a result, Respondent has not violated provisions of the FECA by accepting corporate contributions pursuant to 2 U.S.C. § 441a(a)(1)(A).

While the Complaint alleges that contributions were received by twenty-one (21) entities, in fact only three (3) of the entities were confirmed to be from prohibited sources and those

contributions were maintained in a separate account. Those funds were not used by the Respondent and refunded once the corporate status was confirmed. Another three (3) questionable contributions were refunded, because the contributor did not return the requested notice as to their legal status. As it turned out in one of those cases, (Verdegaal Bros.) the contribution was later confirmed to have been made from a permissible source; a partnership. Therefore, no illegal corporate contributions were received and retained by Respondent.

C. ALLEGED EXCESSIVE INDIVIDUAL CONTRIBUTIONS

The FECA states "no person shall make contributions to any candidate, his or her authorized political committees or agents with respect to any election for Federal office which, in the aggregate, exceed \$1,000." (11 C.F.R. § 110.1(b)). The FEC Regulations state in the case of a contribution made from a contributor's joint account that, unless otherwise designated, the full amount of the contribution will be attributed to the joint account holder who signs the contribution instrument.

In the event a contribution is received from a joint account and signed by a single contributor, the result of which causes that contributor to be in excess of the \$1,000.00 contribution limit, the committee is authorized to deposit the check provided that the amount of the contribution would not constitute an excess contribution if it were allocated between/among the joint account holders. After depositing the check the committee treasurer is required to determine from the contributor as to whether the contribution was intended to be a joint contribution by more than one of the account holders.. The Committee must inform the contributor of their right to request the return of the excessive portion of the contribution or the Committee may inquire if the excessive portion was intended to be a contribution by the other

individual(s) on the joint account. (11 C.F.R. § 110.1(k)(3)(ii)(A).) In the event reattribution is not obtained, "... the treasurer shall, within sixty (60) days of the treasurer's receipt of the contribution, refund the contribution to the contributor." (11 C.F.R. § 103.3(b)(3)).

The reattribution must be a written statement from the original contributor indicating that the contribution is intended to be a joint contribution and a signed statement from the other joint account holder(s) indicating an acceptance that they intend to make a contribution to the committee. (11 C.F.R. § 110.1(k)(3)(ii)(B).) The original contributor and the person(s) to whom the excessive contribution will be reattributed must sign this form. (11 C.F.R. § 110.1(k)(3)(ii)(B).)

As noted above, Respondent has adopted a system to comply with all of requirements under the FECA, including reattribution. This system includes a letter that the Respondent sends to contributors who exceeded the \$1,000 limit to inquire whether they intended a joint contribution, in which case reattribution of their contribution was available. (A copy of that letter is attached at Exhibit 46). The Committee also sends a document that permitted the contributors to indicate how they would like their contribution reattributed and to obtain their signatures. (A copy is attached at Exhibit 47). Given Respondents compliance with the procedures designed for its use by Knight & Associates, it has used its "best efforts" to comply with the requirements of the FECA regarding the reattribution of individual contributions exceeding the limit.

The Schneiders

The Complaint first alleges that a contribution received from Gregory Schneider in the amount of \$2,000 violated 2 U.S.C. § 441a(a)(1)(A). This contribution, dated January 3, 2000 and drawn on a joint account of Gregory and Cathie Schneider. The Respondent notified Mr.

Schneider of its inability to accept a contribution exceeding the individual limit of \$1,000 and inquired as to the intent to have this deemed to be a joint contribution by the account holders. (A copy of the letter is attached at Exhibit 48). A written reattribution was timely received by Respondent on March 3, 2000 and executed within sixty (60) days of the contribution as required by 11 C.F.R. § 110.1(k)(3)(ii)(B). (A copy is attached at Exhibit 49). Consequently, these contributions do not exceed the individual contribution limits and are permissible under the FECA.

The Stefanopoulos

The Complaint next alleges that a contribution received from Peggy Stefanopoulos in the amount of \$2,000 violated 2 U.S.C. § 441a(a)(1)(A). This contribution, dated March 20, 2000 and drawn on the joint account of Peggy and A. Stefanopoulos. The Respondent sent it's standard reattribution inquiry letter to Ms. Stefanopoulos. It indicated Respondent's inability to accept a contribution exceeding the individual limit of \$1,000 and inquired as to whether it was intended as a joint contribution, in which case it could be reattributed between the joint account holders. (A copy of the letter is attached at Exhibit 50). A written reattribution was timely received by Respondent on May 15, 2000 and executed within sixty (60) days of the contribution as required by 11 C.F.R. § 110.1(k)(3)(B). (A copy is attached at Exhibit 51). Consequently, these contributions do not exceed the individual contribution limits and are legal.

IV. "BEST EFFORTS" REQUIREMENTS

The Complaint alleges that Respondent failed to comply with the "best efforts" provisions of 2 U.S.C. § 432(i); specifically that Respondent failed to disclose the name, mailing address, occupation, and name of the employer of individuals who contributed more than \$200 per calendar year as required by 11 C.F.R. § 104.7.

Contrary to the public's misconstrued perception, the "best efforts" requirements for itemized disclosure does *not* require the Committee to secure the address, occupation, and employer for each contributor who contributes in excess of \$200 per calendar year. Rather, "best efforts" mandates that the Committee first request such information on its initial solicitation notice, 11 C.F.R. § 104.7(a)(1), and then should the information not be included with the contribution, the Committee must make a second request for that information. 11 C.F.R. § 104.7(a)(2). The second request may either be written or oral, and must be made within thirty (30) days of receipt of the contribution. *Id.* Absent the cooperation of the contributor to provide the information, the Committee is not able to compel the contributor to produce his/her address, occupation, and employer. 11 C.R.F. § 104.7(a) ("When the treasurer of a political committee shows that best efforts have been used to obtain, maintain and submit the information required by the Act for the political committee, any report of such committee *shall be considered in compliance with the Act.*") (emphasis added).

As with the other components of the Respondent's compliance system, the Respondent has in place a system to fulfill the best efforts requirements. All solicitation notices contain "a clear and conspicuous" request for the mailing address, occupation, and employer of the contributor. Should the contributor not provide the information requested, the Committee sends a letter within thirty days requesting such information. (A copy of a letter requesting the information is attached at Exhibit 52). This exhibit 52 also includes a letter to Respondent from Knight & Associates, retained by Respondent to provide FEC compliance serves, outlining the compliance procedures in place for "best efforts" as well as the procedures for all other compliance issues.

Clearly the Respondent has established a system that satisfies the "best efforts" requirements established by the Commission regardless of the percentage of contributors who provided the requisite information to the Committee.

V. CONCLUSION

Based upon the reasons set out above, the Respondent submits that the Complaint sets forth no facts whatsoever to support claims under the FECA that Respondent has or may have violated the Act and we request the Commission make an affirmative finding of No Reason To Believe and close this matter.

Respectfully submitted,
SULLIVAN & MITCHELL, P.L.L.C.



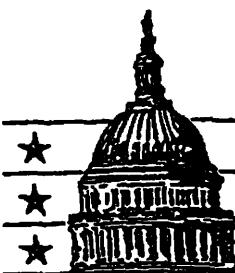
Paul E. Sullivan, Esq.
Counsel to Respondent

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 1

ଶାନ୍ତିକାନ୍ତିକା



DEMOCRATIC
CONGRESSIONAL
CAMPAIGN COMMITTEE

Hon. Patrick J. Kennedy, RI
Chairwoman

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

August 2, 2000

MUR 5062

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

AUG 7 11 20 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, Verdegaard 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.

August 1, 2000

Page 2

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	Verdegaard 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)

August 1, 2000

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(limited liability companies).¹ 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.

¹ 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).

August 1, 2000

Page 4

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.

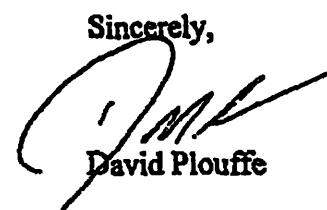
According to the nonpartisan Center for Responsive Politics, Rodriguez fully identified only 72% of his contributors. (See Attachment B) This record is woefully inferior not only to that of his opponent, who has a 96% record, but also to that of the two major party Presidential candidates, both of whom 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

August 2, 2000

Page 5

STATE OF Washington)
County of D.C.)

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

Mable J. Lewis

Notary Public

My Commission Expires:
My Commission Expires October 31, 2002

211-025-0826

[HOME](#) | [PRESIDENTIAL RACE](#) | [CONGRESSIONAL RACES](#) | [DONOR LOOKUP](#) | [PACS](#) | [SOFT MONEY](#) | [LOBBYISTS](#) | [SEARCH](#)
[WHAT'S NEW](#) | [NEWS AND ISSUES](#) | [STATES](#) | [POLITICIANS](#) | [LINKS](#) | [PUBLICATIONS](#) | [ABOUT US](#) | [SHOP OPEN SECRETS](#)

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 HOMEPRIMARY DATESFORMAT TO PRINTopensecrets.org

2000 PRESIDENTIAL RACE Quality of Disclosure

(How to read this chart / methodology)

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%)

NOTE: All the numbers are for the 1999-2000 election cycle and based on Federal Election Commission data as of July 2000. Feel free to contact us for more information. The numbers don't add up to 100% because some candidates didn't file disclosure statements.

[HOME](#) | [PRESIDENTIAL RACE](#) | [CONGRESSIONAL RACES](#) | [DONOR LOOKUP](#) | [PACS](#) | [SOFT MONEY](#) | [LOBBYISTS](#) | [SEARCH](#)
[WHAT'S NEW](#) | [NEWS AND ISSUES](#) | [STATES](#) | [POLITICIANS](#) | [LINKS](#) | [PUBLICATIONS](#) | [ABOUT US](#) | [SHOP OPEN SECRETS](#)

SUMMARY DATA:

[Total Raised](#)
[Quality of Disclosure](#)

Quality of Disclosure**2000 RACE: CALIFORNIA DISTRICT 20****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](#)

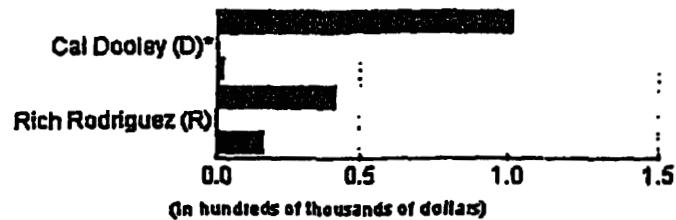
[INCUMBENT PROFILE](#)
[1998 ELECTION](#)
[CALIFORNIA](#)
[PICK ANOTHER RACE](#)

CONTACT US:
feedback@opensecrets.org



THE CENTER
FOR RESPONSIVE
POLITICS

opensecrets.org



■ 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.

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

* Incumbent

HOW TO READ
 Federal election that all contributions more than \$200 be the donor's name, a occupation and disclosed. Most identify the great their donors' occ 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 E data released on Ju to distribute or cit please credit the Ce Politics.

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		
PANOCHÉ 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

Jurisdiction: California

Mailing Address

12319 - 12TH AVENUE
HANFORD, CA 93230

Agent for Service of Process

EDWARD COSTA
12319 - 12TH AVENUE
HANFORD, CA 93230

Corporation

DANELL BROS., INC.

Number: C0751710 Date Filed: 8/5/1975 Status: active

Jurisdiction: California

Mailing Address

8265 HANFORD-ARMONA RD
HANFORD, CA 93230

Agent for Service of Process

MARIGAIL DANELL
8265 HANFORD-ARMONA ROAD
HANFORD, CA 93230

Corporation

GWF POWER SYSTEMS COMPANY, INC.

Number: C1298697 Date Filed: 2/11/1986 Status: active

Jurisdiction: California

Mailing Address

4300 RAILROAD AVENUE
PITTSBURG, CA 94565

Agent for Service of Process

DUANE H NELSEN
4300 RAILROAD AVENUE
PITTSBURG, CA 94565

Corporation

OVERLAND STOCK YARDS

Number: C0378080 Date Filed: 6/24/1959 Status: active

Jurisdiction: California

Mailing Address

10565 9TH AVE
HANFORD, CA 93230

Agent for Service of Process

PETER BELEZZUOLI
10565 9TH AVE
HANFORD, CA 93230

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

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 2

August 10, 2000

«Title»
«FirstName» «LastName»
«Address1»
«City»

Dear «FirstName»:

Thank you so much for your generous support of Rich's campaign. Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership or the contributor must complete and return the following letter.

We would appreciate your original reply in the enclosed envelope, and if you would please FAX it to us at (530) 894-1996. Please do not hesitate to call me at (530) 894-6567 should you have any questions. Once I receive your reply, we will keep it on file so that we won't have to request this information next time. Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Faeken

The checks written on the account of «Title», ARE NOT corporate checks. Note: If this check is drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below. If it is a sole proprietorship, please give first and last name of business owner.

Authorized Signer

Date

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 3

44-08025-025-01-42

Rich Rodriguez
for U.S. Congress

Dear Friends:

My sincere gratitude for your generous support of my campaign. The commitment that you have made has a direct bearing on the success of our 2000 bid for congress.

Unfortunately, the Federal Election Commission has set up strict regulations regarding contributions to political campaigns. Congressional campaigns are prohibited by federal law from accepting donations drawn against corporate funds.

Please find enclosed a refund of your contribution in the amount of \$ [redacted]. It would mean a great deal to me if you could send in a contribution from your personal funds. I have enclosed a pre-paid postage envelope for your convenience.

I apologize for the inconvenience, but your contribution and continued support means a great deal. I'm honored to have you on the team.

Sincerely,

Rich Rodriguez

End.: Check
Envelope

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 4

0730 - 0830
1100 - 1200
1400 - 1500
1700 - 1800

卷之三

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 5

0380-5221-11-12

8377

OROSI SWAP MEET
OROSI & MEASULAR INC.
10300 AVENUE 400
OROSI, CALIFORNIA 92367
(714) 851-4324

Sanwa Bank 15750 S. Marine Way
Cerritos, CA 90701

PAY: TWO HUNDRED FIFTY DOLLARS

11-087210

CHECK NO. 8377

DATE
02/21/00

AMOUNT

*****9250.00

TO THE Committee to Elect
Orosi Rich Rodriguez

or

MEMO: donation

#008377# 0210004001 0299=05478#

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 6

OROSI SWAP MEET

16300 AVENUE 400
OROSI, CALIFORNIA 93610
(800) 581-6224

SIX HUNDRED DOLLARS

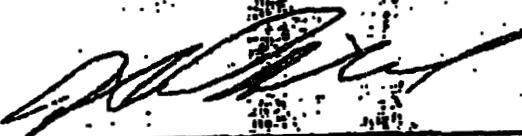
THE Friends and Farmers of
DNR Rich Rodriguez

Sonoma Bank 22790 El Monte Way
Cotati, CA 93647

11-20-2010

CHECK NO. 8520

DATE AMOUNT
04/26/00 \$600.00



THE REVERSE SIDE OF THIS DOCUMENT INCLUDES AN INFRARED WATERMARK. HOLD AT AN ANGLE TO VIEW.

000852010162100040000299-05478

1
2
3
4
5
6
7
8
9
0

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 7

2500.520.631.42

025-020-0053

FOR RICH RODRIGUEZ
FOR CONGRESS

PO BOX 11127
PISANO, CA 93771

Pay to the Order of One thousand eight 18 850.00
Fifteen hundred 15 850.00 850.00
Dollars 0 850.00

Bank of America

SW: Wood Branch #1208
101 West 5th Street
Pisano, CA 93771 (905) 467-3331

For

\$121000.35 B.C. #1158 1125 RD#0463

1158

11-20-1979
BSP

Date 7/28/80

J. Hall

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 8

2025 RELEASE UNDER E.O. 14176

21:15:025-0855

QUICK SIGNS
8725 N. BLACKSTONE #101
FRESNO, CA 93710
(559) 281-1837

2772

UNION BANK
FRESNO, CA 93720
11491210

2/21/2000

PAY TO THE FRIENDS TO ELECT RICH RODRIGUEZ
ORDER OF

Five Hundred and 00/100
Friends to Elect Rich Rodriguez

MEMO contributions

1000 277210 12100049762400016701



DOLLARS

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 9

RECEIVED APR 27 2000

Friends and Farmers for Rich Rodriguez

P.O. Box 11127
Fresno, CA 93711

April 11, 2000

Quick Signs
6725 N. Blackstone, #101
Fresno, CA 93710

Dear Friends:

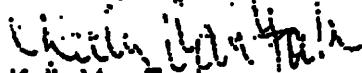
Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership. or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please call me at (530) 894-6567 should you have any questions. Once I receive your reply, we will keep it on file so that we won't have to request this information next time! Once again, thank you for your support, both financial and moral.

Sincerely,


Kelly Van Foeck
Campaign Finance Officer

The checks written on the account of Quick Signs, are not corporate checks. Note: If this is a check drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below.

One Proprietary - Christopher L. Richco

Stacy Packer
Authorized Signer

4-25-00
Date

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 10

四庫全書

卷之三

SCHALLER BAIL BONDS
17145 PROSPECT DRIVE
MADISON, CALIFORNIA
209-572-7019

WELLS FARGO BANK
WADEA OFFICE
WADEA, CALIFORNIA
1-2411210

977

21 864 00

PAY TO THE
BANKER OF
BRITISH ROTTERDAM FOR U.S. CONGREGATION

MEMO : POLITICAL: CONTE IDONEITY

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 11

0 . 025 . 0860
011122

Friends and Farmers for Rich Rodriguez

P.O. Box 11127
Fresno, CA 93711

April 11, 2000

Schaller Ball Bonds
17145 Prospect Drive
Madera, CA 93638

RECEIVED MAY 6 2000

Dear Friends:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership. Or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please call me at (530) 894-8567 should you have any questions. Once I receive your reply, we will keep it on file so that we won't have to request this information next time! Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Eecken
Kelly Van Eecken
Campaign Finance Officer

The checks written on the account of Schaller Ball Bonds, are not corporate checks. Note: If this is a check drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below.

[Signature]
Authorized Signer

4/21/00
Date

Paid For By Friends and Farmers For Rich Rodriguez For Congress
P.O. Box 11127, Fresno, CA 93711
FEC ID #C00353524

②

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 12

2025 RELEASE UNDER E.O. 14176

21.19.025.0862

Campaign donation

7199

Monumental Ranch

114-200 Main Street #401

Hanford, California 93230

11-000

MARCH 27 2000

PAY TO THE ORDER OF
KODAK COLOR BUSINESS

\$ 500.00
MAY 2000 100,000 CTS

DOLLARS

BANK OF AMERICA
114-200 Main Street
Hanford, California 93230
MARCH 27 2000

John and Linda

000-00000000-000000000000

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 13

Friends and Farmers for Rich Rodriguez

P.O. Box 1321
Hanford, CA 93232

RECEIVED JUN 6 C.C. 2000

June 2, 2000
SECOND REQUEST

Manzanillo Ranch
11744 2nd Avenue
Hanford, CA 93230

Dear Friends:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership- or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please call me at (530) 894-8587 should you have any questions. Once I receive your reply, we will keep it on file so that we won't have to request this information next time! Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Foeken
Kelly Van Foeken
Campaign Finance Officer

POSTED

The checks written on the account of Manzanillo Ranch are not corporate checks. Note: If this is a check drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below.

THESE CHECKS WRITTEN FROM MANZANILLO RANCH WAS FROM
ROLAND GONZALVES - DBA - MANZANILLO RANCH SOLE PROPRIETORSHIP

Rolland Gonzales
Authorized Signer

JUNE 5, 2000
Date

Paid For By Friends and Farmers For Rich Rodriguez For Congress
P.O. Box 1321, Hanford, CA 93232
FEC ID #C00353524

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 14

TRIPLE B. FARMS
P.O. BOX 346 PH. 202-4101
CONCORD, CA. 94521

1809

1809

DATE 3-27-90

PAY TO THE ORDER OF friends and Farmers for Rich Rodriguez \$ 250.00

Two - hundred and fifty dollars & 00

Bank
Sav. Acc
1990

1809

B. Stein
Gift

1809

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 15

400-025-0862
21-12

RECEIVED APR 19 2000

Friends and Farmers for Rich Rodriguez

P.O. Box 11127
Fresno, CA 93711

April 11, 2000

Triple B Farms
P.O. Box 386
Corcoran, CA 93212

Dear Friends:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership- or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please call me at (559) 894-6567 should you have any questions. Once I receive your reply, we will keep it on file so that we won't have to request this information next time! Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Fack
Kelly Van Fack
Campaign Finance Officer

The checks written on the account of Triple B Farms, are not corporate checks. Note: If this is a check drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below:

B. Steven Boyett - 1248 Chandler St. Tulare, CA 93274 - 33 1/3 %
Michael A. Boyett - 1087 Estes Corcoran, CA 93212 - 33 1/3 %
David L. Boyett - 441 Patton Corcoran, CA 93212 - 33 1/3 %

Steve Boyett
Authorized Signer

Date

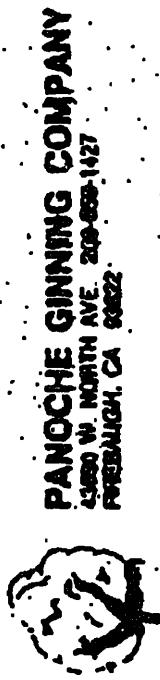
4-17-00

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 16

2-1-1955 DEPT. # 21555



PANOCHE GINNING COMPANY
1250 W. NORTH AVE. 202-653-1427
FRESNO, CA 93722

11-81/22
120
3-29 152005

PAY TO THE ORDER OF Farmers For Rich Rodriguez \$500.00

PANOCHE \$500 DUE 5/00 1955

DOLLARS

UNION BANK OF CALIFORNIA
FRESNO NATIONAL BANK
MURDOCK, CO. 93722

Rich Rodriguez

1390007471 121000019714 10215555#

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 17

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Friends and Farmers for Rich Rodriguez

P.O. Box 11127
Fresno, CA 93711

April 11, 2000

Panoche Ginning Company
43890 W. North Avenue
Firebaugh, CA 93622

Dear Friends:

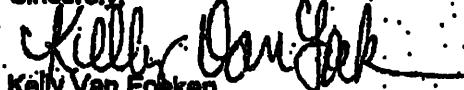
Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership- or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please call me at (530) 894-5667 should you have any questions. Once I receive your reply, we will keep it on file so that we won't have to request this information next time! Once again, thank you for your support, both financial and moral.

Sincerely,


Kelly Van Fossen
Campaign Finance Officer.

The checks written on the account of Panoche Ginning Company, Account #3390007472, are not corporate checks. Note: If this is a check drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below.

37840 Mike + Judy Silvera (37840) 3229 W. Paul Firebaugh CA 93711
37590 Richard + Joanne Sotoiva P.O. Box 244 Mendota CA 93640
25070 Ed + Sharon Windmill 19132 S. Center Das Palos CA 93620

Authorized Signer:

4-18-00
Date

PGC

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 18

2025 RELEASE UNDER E.O. 14176

PL-10-025-0275



2995

TRES PANOCHE LAND CO.
7507 ROAD 36 200-074887
MADEIRA, CA 95360

Montealto

11-2
1981

WELLIS FARGO BANK

511 DAVIS AVENUE, MADEIRA, CA 95360

THE SUM \$11000.00

PAY

TO
BUTCH MONTEALTO FOR BUSINESS
THE
ORDERS
OF

AMOUNT
\$1,000.00

DATE
3/30/80

Conrad Holmes

WFO 29358 15121000248542010675848

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

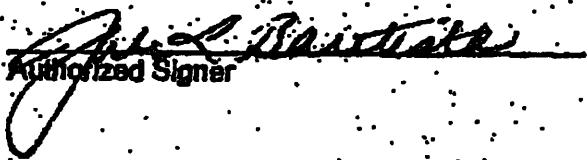
Exhibit 19

21-19-00-025-0876

Tres Panoche Land Co.

The checks written on the account of Tres Panoche Land Co., Account #4201067584, are not corporate checks. Note: If this is a check drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below.

Jane L. Baetzke	1/3	7567 Road 38 Modesto, CA 95357
Carol L. Baetzke	1/3	
Steve Rodriguez	1/3	


Authorized Signer

4-18-00
Date

Paid For By Friends and Farmers For Rich Rodriguez For Congress
P.O. Box 11127, Fresno, CA 93711
FEC ID #C00353524

RECEIVED

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 20

080878
000000
020000
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000000
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38659

TEL: 419-825-0877

WESTSIDE CHEMICAL CO.
2575 S. UNION AVE., BOX 7-3300-4444
MENDOTA, CA 93640



CHECK DATE

CHECK NUMBER

8653

REGISTERED
P-43964-12

200.00 C.O.D.

200.00

FRIENDS AND FARMERS FOR RICH RODRIGUEZ
C/O THE MAK GROUP
P. O. BOX 1321
HANFORD, CA 93232

CALIFORNIA BANK AND TRUST
COMM. BK. DIV. SAN FRANCISCO CA 941
415-244-1121

100086531P 11210020420: 017 000087670P

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 21

ପାତ୍ରବିଦ୍ୟା

RECEIVED MAY 3 6 2000

Friends and Farmers for Rich Rodriguez

P.O. Box 11127
Fresno, CA 93711

April 25, 2000

Westside Chemical Co.
2578 S. Lyon Avenue, Box 7
Mendota, CA 93640

Dear Friends:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership- or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please call me at (530) 894-8567 should you have any questions. Once I receive your reply, we will keep it on file so that we won't have to request this information next time! Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Foeck
Kelly Van Foeck
Campaign Finance Officer

The checks written on the account of Westside Chemical Co., Account #01700007670, are not corporate checks. Note: If this is a check drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below.

CHARLES A. SORENSEN	P. O. BOX 7 MENDOTA, CA 93640	50%
CAROLYN PECK	14354 ROAD 204 MADERA, CA 93638	50%

[Signature]
Authorized Signer

5-3-00
Date

Paid For By Friends and Farmers For Rich Rodriguez For Congress
P.O. Box 11127, Fresno, CA 93711
FEC ID #C00353524

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 22

ଶାନ୍ତିକାନ୍ତିକା

**San Joaquin
Bank**
1000 10th Street
Stockton, CA 95203
Telephone 916-467-3139

2624

4/14/2000

**PAY TO THE
ORDER OF** Friends and Farmers for Rich Rodriguez

Two Hundred and 00/100 DOLLARS

**Friends and Farmers for Rich Rodriguez
C/O The MAK Group
P.O. Box 1321
Hanford, CA 93232**

MEMO:

0000 25 24 00 10 12 22 380 181 02 20382140

SECURITY INFORMATION CONTAINED HEREIN IS UNCLASSIFIED. DATE 10-17-2012 BY 602052

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 23

5000.00000
500.00000
50.00000
5.00000
0.50000

RECEIVED MAY 8 2000

Friends and Farmers for Rich Rodriguez

P.O. Box 11127
Fresno, CA 93711

April 25, 2000

Grapery
1405 Avenida Sabla, Suite 1
Bakersfield, CA 93309

Dear Friends:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership- or the contributor must complete and return the following letter:

We would appreciate your reply in the enclosed envelope. Please call me at (530) 894-6567 should you have any questions. Once I receive your reply, we will keep it on file so that we won't have to request this information next time! Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Foeken
Kelly Van Foeken
Campaign Finance Officer

The checks written on the account of Grapery, Account #022038214, are not corporate checks. Note: If this is a check drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below.

*Grapery is not a partnership, it is a
sole proprietor*

Authorized Signer

4/30/00
Date

Paid For By Friends and Farmers For Rich Rodriguez For Congress
P.O. Box 11127, Fresno, CA 93711
FEC ID #C00353524

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 24

卷之三

Amado
FEDERAL SAVINGS & LOAN
ASSOCIATION

PH. 559-824-4404
P.O. BOX 667
LEMARIE, CA 93249

AY TO THE
ORDER OF

RICH RODRIGUEZ FOR CONGRESS

Two Hundred and 00/100 Dollars

RICH RODRIGUEZ FOR CONGRESS
P.O. BOX 1321
HANFORD, CA 93232

MO

WELLS FARGO BANK
16-26-1220

614700

\$ 200.00

DC

[Handwritten signature]

100080071 11200024710224387829*

8007

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 25

00000.025.011.112

Rich Rodriguez

for U.S. Congress

July 12, 2000

MS D 2 Rec

Arval Legal Services
P.O. Box 667
Lemoore, CA 93245

PARTIED

Dear Friends:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please do not hesitate to call me at (559) 894-6567 should you have any question. Once I receive your reply, we will keep it on file so that we won't have to request this information next time. Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Foeken

Kelly Van Foeken
Campaign Finance Officer

The checks written on the account of Arval Legal Services, ARE NOT corporate checks. Note: If this check is drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below. If it is a sole proprietorship, please give first and last name of business owner.

*Arval Legal Services
P.O. Box 667
Lemoore, CA 93245*

Authorized Signer:

Date:

7-31-01

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 26

83

CK # 8350
000008350

BANK OF AMERICA
MANFORD, CA 93220
11-30-1210

E & B LANDSCAPE & GARDEN SUPPLY
12310 12TH AVE [559] 564-6460
MANFORD, CA 93220

PAY TO THE ORDER OF: FUCH RODRIGUEZ

TO THE ORDER OF: CONGRESS

DATE: 06/15/00

AMOUNT: **** * \$200.00

AUTHORIZED SIGNATURE

Alfredo M. Lopez

10008350 11200003584 00189"00010111
"Security Features included. Details on back.

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 27

卷之三

**FRIENDS & FARMERS FOR
RICH RODRIGUEZ
FOR CONGRESS**

PO BOX 11127
FRESNO, CA 93711

1189
Date 1-15-2000
11-35/1210
128

Pay to the E; Blendscape : Garden Supply, \$ 200.00
Order of Two hundred and
Two hundred and

B Bank of America

Shaw - Westgate Branch #1268
3411 West Shaw Avenue

Fresno, CA 93711 (209) 489-2251

For *Conrad* refund

D. A. O.

12100035891189012690163

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 28

25-190-025-0875

DANELL BROS., INC.
8265 HANFORD ARMONIA ROAD
HANFORD, CALIFORNIA 93230
(209) 582-2271

8694

11-24
11-20
DATE June 19, 2000

PAY TO THE
ORDER OF Ferdanda & Farmers for Rich Rodriguez

\$ 200.00
TEN 200 DOLLARS

WELLS FARGO BANK

Marijane Danell

nd

"008694" 151210002481446 4707980

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 29

Friends and Farmers for Rich Rodriguez

**P.O. Box 1321
Hanford, CA 93232**

July 13, 2000

Danell Bros., Inc.
8265 Hanford-Armona Road
Hanford, CA 93230

Dear Friends:

My sincere gratitude for your generous support of my campaign. The commitment that you have made has a direct bearing on the success of our 2000 bid for congress.

Unfortunately, the Federal Election Commission has set up strict regulations regarding contributions to political campaigns. Congressional campaigns are prohibited by federal law from accepting donations drawn against corporate funds.

Please find enclosed a refund of your contribution in the amount of \$200.00. It would mean a great deal to me if you could send in a contribution from your personal funds. I have enclosed a pre-paid postage envelope for your convenience.

I apologize for the inconvenience, but your contribution and continued support means a great deal. I'm honored to have you on the team.

Sincerely,

Rich Rodriguez

Encl.: Check
Envelope

FRIENDS & FARMERS FOR RICH RODRIGUEZ FOR CONGRESS PO BOX 1321 FRENO, CA 93232		1157 11-19712 111
Pay to the Order of <u>Danell Bros.</u>		Date <u>7/13/00</u>
<u>Two hundred and</u>		<u>\$ 200.00</u>
<u>Bank of America</u> 2011 West Main Avenue Fresno, CA 93711 (209) 482-1221		<u>Two hundred and</u>
<u>For refund</u>		<u>\$ 200.00</u>
<u>151280003584215701269004636</u>		

J. Bell

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 30

22-14-2025-00000

05/20/71 9:16 AM OSPTR56563

25595393535 - 0370

SIERRA VISTA PHARMACY

450 E. VISALIA ROAD
FARMERSVILLE, CA 93223
(209) 596-3636

BANK OF THE SIERRA
2515 S. MOONEY BLVD
VISALIA, CA 93277

16922

421.40

90-3702/1211

Ricardo Rodriguez for Congress

DOUBLES

Two Hundred and Ten Dollars

Ricardo Rodriguez for Congress

Ricardo Rodriguez

05/20/71 9:16 AM OSPTR56563

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 31

ପାତ୍ରବିନ୍ଦୁ

Rich Rodriguez

for U.S. Congress

RECEIVED

July 5, 2000

JUL 12 2000

Sierra Vista Pharmacy
650 E. Visalia Road
Farmersville, CA 93223

Dear Friends:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please do not hesitate to call me at (559) 894-6567 should you have any question. Once I receive your reply, we will keep it on file so that we won't have to request this information next time. Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Foeken

Kelly Van Foeken
Campaign Finance Officer

The checks written on the account of Sierra Vista Pharmacy, ARE NOT corporate checks. Note: If this check is drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below. If it is a sole proprietorship, please give first and last name of business owner.

Mike Goettschy

1702 E. Highway 41

51%

Visalia, CA 93277

Ken Johnson

379 E. Backer St

5%

Visalia, CA 93277

Rich Rodriguez

Date

Rich Rodriguez
Authorized Signer

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 32

2020.025.0702
2020.025.0703
2020.025.0704

CWE POWER SYSTEMS, L.P.

4300 RAILROAD AVE
PITTSBURG, CA 94565
(925) 431-1444

STATE OF CALIFORNIA
No. ADAMN No. 507
P.O. Box 2124
CONCORD, CA 94520
16-261205

RECEIVED
19962

06/26/2000
06/26/2000

Two Hundred Dollars And 00 Cents

RICHARD ROBRIGUEZ
FOR U.S. CONGRESS

SEN

Richard Rodriguez

RECEIVED
19962
16-22200006616
1257700033511

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 33

Rich Rodriguez
for U.S. Congress

File 1 2 Rec

July 5, 2000

GWF Power Systems
Riley Jones
4300 Railroad Avenue
Pittsburg, CA 94565

Dear Riley:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please do not hesitate to call me at (530) 894-6567 should you have any question. Once I receive your reply, we will keep it on file so that we won't have to request this information next time. Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Foeken

Kelly Van Foeken
Campaign Finance Officer

The checks written on the account of GWF Power Systems, ARE NOT corporate checks. Note: If this check is drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below. If it is a sole proprietorship, please give first and last name of business owner.

Please see attached

Robert (Bob) Art Gantler 8/10/00
Date
Authorized Signer

**HANFORD L.P.
DBA: GWF POWER SYSTEMS**

**FED ID 68-0319815
CA ID 402-7445-8**

GWF HANFORD, INC. - MANAGING GENERAL PARTNER

MAILING ADDRESSES:

GWF **4300 RAILROAD AVE.
PITTSBURG, CA 94565
(925) 431-1444**

PSEG GLOBAL **35 WATERVIEW BLVD.
PARSIPPANY, NJ 07054
(973) 541-8000**

HARBERT **ONE RIVERCHASE PARKWAY SO.
BIRMINGHAM, AL 35244
(205) 987-5500**

PARTNERS:

GENERAL PARTNERS:

GWF HANFORD, INC. 2.0%
PSEG HANFORD, INC. .5%
HARBERT HANFORD, INC. .5%

LIMITED PARTNERS

PSEG GLOBAL USA, INC. 48.5%
HARBERT GWF, INC. 48.5%

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 34

2025.025.0907
2025.025.0907
2025.025.0907
2025.025.0907

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 35

6060-025-01-12

GILKEY ENTERPRISES

P.O. BOX 428
CORCORAN, CA 93212-0428
(559) 992-2136

SANJWA BANK CALIFORNIA - ~~1316~~
1065 Whittier Street
Corcoran, California 93212

02408

Pay Five Hundred Dollars 00 Cents

CHECK AMOUNT

DATE CHECK NO.

6/22/7900 024087 \$*****500.00

PAV
TO
FRIENDS & FARMERS RICH RODRIGUEZ
P.O. BOX 11127
FRESNO CA 93706
CASH
OR

"024087" \$12000.00: 0304005145"

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 36

44-160-025-0917
47-147-141-11

Rich Rodriguez

for U.S. Congress

July 5, 2000

5/13/00

Gilkey Enterprises
P.O. Box 426
Corcoran, CA 93212

Dear Friends:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please do not hesitate to call me at (530) 894-6567 should you have any question. Once I receive your reply, we will keep it on file so that we won't have to request this information next time. Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Foeken

Kelly Van Foeken
Campaign Finance Officer

The checks written on the account of Gilkey Enterprises, ARE NOT corporate checks.

Note: If this check is drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below. If it is a sole proprietorship, please give first and last name of business owner.

Donald J. Gilkey P.O. Box 426 Corcoran, Ca 50%
Charles R. Gilkey P.O. Box 426 Corcoran, Ca 50%

Christina Diaz

Secretary

7-27-00

Authorized Signer

Date

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 37

ମହାବିଦ୍ୟା

OVERLAND STOCKYARDS

GENERAL ACCOUNT
10855 8TH AVENUE
MANFORD, CA 92230
(651) 562-0404



002530

NUMBER 0253

WELLS FARGO BANK

11-841244

AMOUNT 000.00 200.00

DATE 08/05/21

RICH RODRIGUES
FOR CONGRESS COMMITTEE
3EA

BRING EVERY MON. THUR.
SPECIAL BEEF BONE
PORK MEDALLION

40253021 121000 2186 4085 011843

11

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 38

RICH RODRIGUEZ
FOR CONGRESS
PO BOX 11127
FRESNO, CA 93771

21199 P. 1125 - 09/15
11-3916
125

Pay in the Order of Orlando Stark Two hundred and

Two hundred and

\$ 200.00

\$ 200.00

Dollars 00

Bank of America
Shaw-Westgate Branch #1260

3611 West Shaw Avenue
Fresno, CA 93711 (209) 488-2251

For Certificate Required

1:12:00 PM 11/19/00 12690004630

J. Hall

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 39

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 40

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Rich Rodriguez

for U.S. Congress

12-12-00

July 6, 2000

Tiemersma Dairy
29981 Road 60
Visalia, CA 93291

Dear Friends:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please do not hesitate to call me at (559) 894-6567 should you have any question. Once I receive your reply, we will keep it on file so that we won't have to request this information next time. Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Focken

Kelly Van Focken
Campaign Finance Officer

The checks written on the account of Tiemersma Dairy, ARE NOT corporate checks.

Note: If this check is drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below. If it is a sole proprietorship, please give first and last name of business owner.

✓	Telle - Jim Tiemersma	29981 R160	VISALIA CA 93291	54%
✓	Frace - Jim Tiemersma	29981 R160	VISALIA CA 93291	46%
✓	Mike - Tiemersma	29981 R160	VISALIA CA 93291	50%
✓	Debra - Tiemersma	29981 R160	VISALIA CA 93291	50%

[Signature]
Authorized Signer

7-8-00

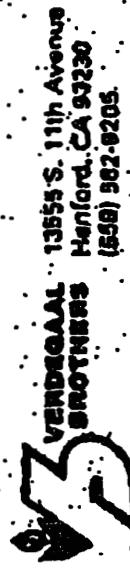
Date

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 41

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22



BANK OF THE SIERRA
477 WEST LACEY BLVD.
MANFORD, CA 93230
(656) 982-9205

00577:

Four hundred dollars and 00/100 \$400.00

AMOUNT
\$400.00

DATE
6-23-00

Rich Rodriguez for Congress

Rich Rodriguez

400577 610 16263702716 42000737016

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 42

ମହାଭାଗିତା

CE1000- AUG 1 1 2000

Rich Rodriguez
for U.S. Congress

August 9, 2000
SECOND REQUEST

Verdegaal Brothers
13555 S. 11th Avenue
Hanford, CA 93230

(SEP 05 REC'D)

Dear Friends:

Thank you so much for your generous support of Rich's campaign. Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope, or you can FAX it to us at (530) 894-1996. Please do not hesitate to call me at (530) 894-6567 should you have any question. Once I receive your reply, we will keep it on file so that we won't have to request this information next time. Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Foeken

Kelly Van Foeken
Campaign Finance Officer

The checks written on the account of Verdegaal Brothers, ARE NOT corporate checks.
Note: If this check is drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below. If it is a sole proprietorship, please give first and last name of business owner.

William Verdegaal 51%
Josephine Verdegaal 49%

William Verdegaal

Authorized Signer

8-30-00
Date

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 43

2010-09-21-192

FRIENDS & FARMERS FOR

RICH RODRIGUEZ

FOR CONGRESS

PO BOX 11127

FRESNO, CA 93771

Pay to the Order of **Verde and Bred,**

Two hundred and

Bank of America

Shaw - Westgate Branch #1200

2611 West Shaw Avenue

Fresno, CA 93711 (559) 455-2251

For Corporate refund

1210003581:11881126900016361

1188

11-25-1989

Date Aug 15, 2000

1188

\$ 400.00

400.00 Dollars

00

R. H. B.

Contra Costa Bank

Sep 12 00 04:07p

Craig A. Boone

(559) 449-1136

P.6

09/12/2000 13:35

0000000000

AAAAAAAAAAAAA

PAGE 02

CE111-1 1 2000

Rich Rodriguez

for U.S. Congress

August 9, 2000
SECOND REQUEST

Verdegaal Brothers
13555 S. 11th Avenue
Hanford, CA 93230

1 SEP 05 REC'D:

Dear Friends:

Thank you so much for your generous support of Rich's campaign. Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope, or you can FAX it to us at (530) 894-1996. Please do not hesitate to call me at (530) 894-6567 should you have any question. Once I receive your reply, we will keep it on file so that we won't have to request this information next time. Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Foeken

Kelly Van Foeken
Campaign Finance Officer

The checks written on the account of Verdegaal Brothers, ARE NOT corporate checks. Note: If this check is drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below. If it is a sole proprietorship, please give first and last name of business owner.

William Verdegaal 51%
Josephine Verdegaal 49%

William Verdegaal 8-30-00
Authorized Signer Date

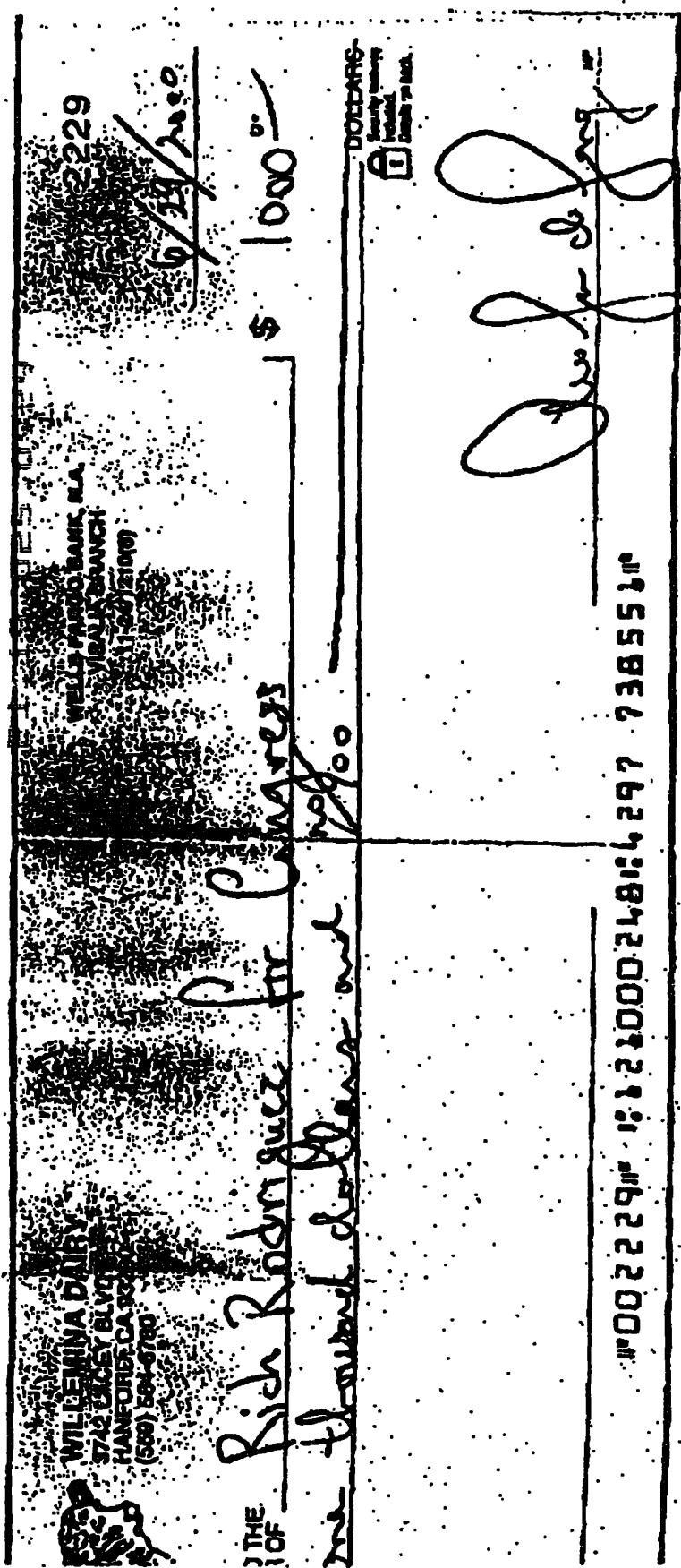
②

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 44

四庫全書



WILLEMINA L.
3742 ESTATE BLV
HANFORD CA 93230
(559) 581-6740

THE BANK, N.Y.

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Rich Rock quarry
for Carrera
Marble

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000222911181210002942973855911

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 45

00-117-025-0630

Rich Rodriguez

for U.S. Congress

AUG 05 2000

July 6, 2000

Willemina Dairy
Willie & John de Jong
3742 Lacey Blvd.
Hanford, CA 93230

POSTED

Dear Willie & John:

Thank you so much for your generous support of Rich's campaign.

Unfortunately, due to Federal Election law, we are forced to ask you to document some additional information. Federal campaigns are not allowed to accept any checks drawn against a corporation. We are only allowed to accept contributions drawn on partnerships, sole proprietorships and/or personal accounts.

When accepting funds drawn against a partnership, the Federal Election Commission requires that we obtain documentation of each partner's full name, address and percent of ownership or the contributor must complete and return the following letter.

We would appreciate your reply in the enclosed envelope. Please do not hesitate to call me at (530) 894-6567 should you have any question. Once I receive your reply, we will keep it on file so that we won't have to request this information next time. Once again, thank you for your support, both financial and moral.

Sincerely,

Kelly Van Foeken

Kelly Van Foeken
Campaign Finance Officer

The checks written on the account of Willemina Dairy, ARE NOT corporate checks.
Note: If this check is drawn on a partnership, please list the names and addresses & percent of ownership of each of the partners below. If it is a sole proprietorship, please give first and last name of business owner.

John de Jong, 3742 Lacey Blvd. Hanf. CA. 93230

7-11-00

John de Jong
Authorized Signer

Date

7-11-00

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 46

2020.020.001.012

February 2, 2000

Name
ADDRESS
CITY STATE ZIP

Dear NAME:

Thank you so much for your generous contribution to Rich's election campaign.

Strict regulations of the Federal Election Campaign Act limit individual contributions to \$1,000 per individual or partnership, per election cycle. Our records indicate that your January 31, 2000 contribution of \$2000 exceeds the limit for the 2000 Primary Election cycle by \$1000. For this reason, we will need to clarify the distribution of your donation.

It is permissible to reallocate this excess to future election cycles. Please choose one of the options given in the attached letter, sign and return it to us in the enclosed envelope. FEC regulations require us to receive your written response in our office by April 2, 2000.

We are truly sorry for this inconvenience, but appreciate your assistance in this matter. Thank you once again for your generosity and support. Please do not hesitate to contact us at (530) 894-6567 should you have any questions.

Sincerely,

Kelly Van Foeken

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 47

2000-020-01-10

Friends & Farmers For Rich Rodriguez for Congress
P.O. Box 11127
Fresno, CA 93706

Dear Rich:

I wish my 01/31/00 contribution of \$2000.00, check number XXXX to be attributed in the following-manner. (Please choose one of the following choices):

Choice #1: Reattribute Portion to Spouse:

Name of Contributor	\$1000.00	Primary 2000
Spouse Name	\$1000.00	Primary 2000

Authorized by:

Name of Contributor

Name of Spouse.

Choice #2: Redesignate to General 2000 Cycle:

Name of Contributor	\$1000.00	Primary 2000
Name of Contributor	\$1000.00	General 2000

Authorized by:

Name of Contributor

Choice #3: Refund Excess Contribution

Please refund the total excess of my contribution in the amount of \$1000.00.

Authorized by:

Name of Contributor

MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 48

ପ୍ରକାଶକ - କ୍ଷେତ୍ର - ପରିମାଣ

Friends and Farmers for Rich Rodriguez

*P.O. Box 11127
Fresno, CA 93706*

February 19, 2000

Mr. Gregory C. Schneider
6735 N. Golden State Blvd.
Fresno, CA 93722-9316

Dear Gregory:

Thank you so much for your generous contribution!

Unfortunately, strict regulations of the *Federal Election Campaign Act* limit individual contributions to \$1,000 per individual, tribe or partnership, per election cycle. Our records indicate that your January 9, 2000 contribution of \$2000 exceeds the limit for the 2000 Primary Election cycle by \$1000. For this reason, we will need to clarify the distribution of your donation. It is permissible to reallocate the \$1000 over limit to your spouse. Just sign the attached letter and return it to us in the enclosed envelope as soon as possible. FEC regulations require us to receive your written response in our office by March 9, 2000.

We are truly sorry for this inconvenience, but appreciate your assistance in this matter. Thank you once again for your generosity and support. Please do not hesitate to contact us at (530) 894-6567 should you have any questions.

Sincerely,

Kelly Van Foeken
Campaign Finance Officer

Enclosure

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 49

0200-0205-041-112

Friends and Farmers for Rich Rodriguez
P.O. Box 11127
Fresno, CA 93706

POSTED

Dear Rich:

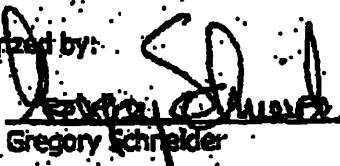
I wish my 1/9/00 contribution in the amount of \$2000.00, check number 11152 to be attributed in the following manner. (Please choose one of the following choices):

Choice #1:

Gregory Schneider	\$1000.00
Cathie Schneider	\$1000.00

Primary 2000
Primary 2000

Authorized by:



Gregory Schneider

AND



Cathie Schneider

OR

Choice #2:

Gregory Schneider	\$1000.00
	\$1000.00

Primary 2000
General 2000

Authorized by:



OR

Choice #3:

Please refund my excess contribution in the amount of \$1000.00.

Authorized by:



MUR 5062

Friends and Farmers for Rich Rodriguez for Congress Committee

Exhibit 50

ପ୍ରକାଶମୁଦ୍ରଣ - ବ୍ୟାପକ - ବିଜ୍ଞାନ - କବିତା

Friends and Farmers for Rich Rodriguez

*P.O. Box 11127
Fresno, CA 93711*

April 11, 2000

Peggy Stefanopoulos
2140 West Alluvial
Fresno, CA 93711

Dear Peggy:

Thank you so much for your generous contribution to Rich's election campaign.

Strict regulations of the Federal Election Campaign Act limit individual contributions to \$1,000 per individual or partnership, per election cycle. Our records indicate that your March 20, 2000 contribution for \$2000 exceeds the limit for the 2000 General Election cycle by \$1000. For this reason, we will need to clarify the distribution of your donation.

It is permissible to reallocate this excess to your spouse. Please choose one of the options given in the attached letter, sign and return it to us in the enclosed envelope. FEC regulations require us to receive your written response in our office by May 19, 2000.

We are truly sorry for this inconvenience, but appreciate your assistance in this matter. Thank you once again for your generosity and support. Please do not hesitate to contact us at (530) 894-6567 should you have any questions.

Sincerely,

Kelly Van Foeken
Kelly Van Foeken
Campaign Finance Officer

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 51

2021-02-25-09412

RECEIVED MAY 12 2000

Friends & Farmers For Rich Rodriguez for Congress
P.O. Box 11127
Fresno, CA 93706

Dear Rich:

I wish my 03/20/00 contribution in the amount of \$2000.00, check number 2097 to be attributed in the following-manner. (Please choose one of the following choices):

Choice #1: Reattribute a portion to a Spouse

Peggy Stefanopoulos
A. Stefanopoulos

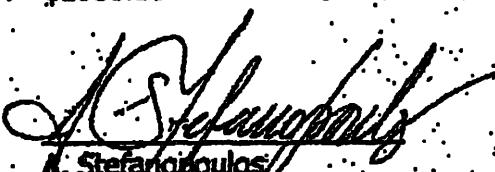
\$1000.00
\$1000.00

General 2000
General 2000

Authorized by:



Peggy Stefanopoulos



A. Stefanopoulos

Choice #2: Refund Excess Contribution

Please refund the total/ excess of my contribution in the amount of \$1000.00.

Authorized by:



Peggy Stefanopoulos

Paid For By Friends and Farmers For Rich Rodriguez For Congress

P.O. Box 11127, Fresno, CA 93711

FEC ID: C00353524

MUR 5062

**Friends and Farmers for
Rich Rodriguez for Congress Committee**

Exhibit 52



Accountancy • Campaign Finance • Consulting

3881 Benistar Lane, Suite G
Chico, California 95928

Email: knightd@dcsi.net

(530) 894-8567
FAX (530) 894-1986

August 17, 2000

Craig A. Boone, CPA
P.O. Box 26658
Fresno, CA 93729-6658

Dear Craig:

Following are the procedures that Knight & Associates follows for receiving information on over limit contributions, contributions from possible prohibited sources, and our procedures for following up on missing information.

Contributions Received:

1. We receive copy of deposit from campaign.
2. Post all contributions to campaign database.
3. As contributions are posted they are reviewed for over limit, possible corporation, third party signature, and any missing or changed information like address or employer and occupation.
4. If it is determined that further research is needed on the contribution a phone call or letter, and in most cases both are used to follow-up. See details below.

Over limit Procedures:

1. When posting a contribution and it is determined that the contribution is over limit it is posted to the individual, partnership, or PAC and a note is placed on the contribution in the computer that a reattribution or redesignation is pending.
2. For an individual contribution that is over limit we determine whether the check was drawn on a joint account. If it was drawn on a joint account we verify whether or not the spouse has contributed for the election cycle.
3. When an over limit contribution occurs a letter is sent to the contributor which explains the law and in most cases gives the contributor three options:

- a. Reattribute the Contribution to a Spouse.
 - i. A space is left for both the original contributor and the spouse to sign
- b. Redesignated to a future election
- c. Request a refund of the over limit contribution.
- 4. The letter lets the contributor know about the deadline by which we must hear from the contributor.
- 5. Once we receive the signed letter, the information is either posted or a refund check is issued.
- 6. Following is an example of how redesignation or reattribution information is posted:

Joe Smith	2/16/00	\$2000	Receipt	Primary 2000
Joe Smith	3/15/00	-\$1000	Memo	Primary 2000
Joe Smith	3/15/00	\$1000	Memo	General 2000

7. Please see attached example.

Possible Prohibited Source Procedures:

- 1. When posting a contribution drawn on a business account it is posted to the business name on the check.
- 2. When we have a phone number we place an initial call to determine the legality of the contribution, then notify the contributor that we will be sending out a letter for them to sign. If we determine it is a corporate contribution or from another prohibited source we refund the check.
- 3. If no phone number is available we send a letter asking the contributor to verify the legality of their contribution.
- 4. Copies of these letters are maintained in a pending file until a response is received.
- 5. Once a response is received the information is posted to the contributor's database record, and the original letter is kept in a permanent file.
- 6. Should we receive a contribution from a partnership that has given in the past, the partnership information will be in the database. We will then call to verify that none of the partnership information has changed since the last contribution.
- 7. When it is determined that the contribution is from a partnership it is posted as follows:

<u>Contributor</u>	<u>Date</u>	<u>Amount</u>	<u>Type</u>	<u>Record</u>
ABC Partners	6/30/00	\$1000	Receipt	Partnership
Jane Smith	6/30/00	\$500	Memo	Individual
Mary Smith	6/30/00	\$500	Memo	Individual

8. If a contribution is received and is signed by an individual who is not listed on the checking account, in most cases it is an accountant or personal secretary, we send a letter that requires the contributor to document the attribution of the contribution. Please see attached third party verification letter.
9. If a contribution is received from a tribal entity a letter is sent requiring them to verify the legality of their contribution. Please see attached tribal letter.

Follow up on Employer and Occupation Information:

1. When contribution is posted, it is determined whether or not the \$200 threshold has been met.
2. If the employer and occupation of the contributor has not been listed on the solicitation correspondence, a letter is sent to the contributor.
3. A copy of the letter is kept in a pending file until the original is received.
4. When the original is received it is posted to the campaign database and the hard copy is kept in a permanent file.
5. If a response is not received after the first letter, second, and third letters are sent as needed.

Attached are a number of samples and I have also included what a contributor records looks like and the amount of detail that is kept on each contributor. Please let me know if you need any other information.

Sincerely,



Kelly Van Foeken
Knight & Associates
(530)894-6567

February 2, 2000

**Name
ADDRESS
CITY STATE ZIP**

Dear NAME:

Thank you so much for your generous contribution to Rich's election campaign.

Strict regulations of the Federal Election Campaign Act limit individual contributions to \$1,000 per individual or partnership, per election cycle. Our records indicate that your January 3, 2000 contribution of \$2000 exceeds the limit for the 2000 Primary Election cycle by \$1000. For this reason, we will need to clarify the distribution of your donation.

It is permissible to reallocate this excess to future election cycles. Please choose one of the options given in the attached letter, sign and return it to us in the enclosed envelope. FEC regulations require us to receive your written response in our office by April 2, 2000.

We are truly sorry for this inconvenience, but appreciate your assistance in this matter. Thank you once again for your generosity and support. Please do not hesitate to contact us at (530) 894-6567 should you have any questions.

Sincerely,

Kelly Van Foeken

Friends & Farmers For Rich Rodriguez for Congress
P.O. Box 11127
Fresno, CA 93706

Dear Rich:

I wish my 01/31/00 contribution of \$2000.00, check number XXXX to be attributed in the following-manner. (Please choose one of the following choices):

Choice #1: Reattribute Portion to Spouse:

Name of Contributor	\$1000.00	Primary 2000
Spouse Name	\$1000.00	Primary 2000

Authorized by:

Name of Contributor	Name of Spouse
---------------------	----------------

Choice #2: Redesignate to General 2000 Cycle:

Name of Contributor	\$1000.00	Primary 2000
Name of Contributor	\$1000.00	General 2000

Authorized by:

Name of Contributor

Choice #3: Refund Excess Contribution

Please refund the ~~total/~~ excess of my contribution in the amount of \$1000.00.

Authorized by:

Name of Contributor

(34)

February 2, 2000

**Name
ADDRESS
CITY STATE ZIP**

Dear NAME:

Thank you so much for your generous contribution to Rich's election campaign.

Strict regulations of the Federal Election Campaign Act limit individual contributions to \$1,000 per individual or partnership, per election cycle. Our records indicate that your January 31, 2000 contribution of \$2000 exceeds the limit for the 2000 Primary Election cycle by \$1000. For this reason, we will need to clarify the distribution of your donation.

It is permissible to reallocate this excess to future election cycles. Please choose one of the options given in the attached letter, sign and return it to us in the enclosed envelope. FEC regulations require us to receive your written response in our office by April 2, 2000.

We are truly sorry for this inconvenience, but appreciate your assistance in this matter. Thank you once again for your generosity and support. Please do not hesitate to contact us at (530) 894-6587 should you have any questions.

Sincerely,

Kelly Van Foeken