



January 27, 2006

MUR# 5705 + 5706

Office of General Counsel
Federal Elections Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2006 FEB - 6 A 10: 06

Dear Counsel,

Enclosed please find two (2) complaints filed by TheRestofUs.org, one against Mr. William Bain Adams of Coronado, CA and one against Mr. Max Gelwix of Poway, CA. Both complaints are signed and sworn to by Ned Wigglesworth, analyst for TheRestofUs.org, and are notarized per the filing instructions on the FEC website. Three (3) copies of each complaint for your convenience.

If these complaints are not sufficient in any manner, please inform us that we may correct them or the accompanying documents.

I look forward to hearing from you that the Commission has opened an investigation into the violations of federal election law by the respondents.

Regards,

Ned Wigglesworth, Analyst
TheRestofUs.org

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FEDERAL ELECTIONS COMMISSION

In the Matter of William Bain Adams, Respondent:
MUR No.: 5706

COMPLAINT

1. TheRestofUs.org brings this complaint against William Bain Adams, Jr. of Coronado, California for violating the federal aggregate contribution limit of \$25,000 in the year 2002. We respectfully petition the FEC for a timely investigation and enforcement action against Mr. Adams for violating federal campaign law.

COMPLAINANT

2. This complaint is brought by TheRestofUs.org, a nonpartisan, nonprofit organization based at the following address:

1107 9th Street
Suite 601
Sacramento, CA 95814

We can be reached at (916) 446-4741.

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RESPONDENT

3. TheRestofUs.org brings this complaint against William Bain Adams, who upon information and belief based on FEC filings, resides in Coronado, CA.

FACTS

4. According to records filed with the Federal Elections Commission (FEC) and made available on the FEC website, William B. Adams, Jr. made the following contributions to federal candidates and committees in 2002:

A. On April 12: \$5,000 to Americans for a Republican Majority Political Action Committee, FEC ID# C00292946. [File image]

B. On May 9: \$1,000 to Benjamin A. Gilman, candidate for the House of Representatives, 20th Congressional District of New York, FEC ID # C00007682. [File Image]

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C. On September 5, 2002: \$5,000 to Future Leaders PAC, FEC ID # C00269407. [File Image]

D. On October 4: \$2,500 to 2002 Great Northwest Classic Committee, FEC ID # C00379511. [File Image]

E. On October 7: \$5,000 to American Prosperity PAC, FEC ID # C00352963. [File Image]

F. On October 9: \$2,500 to Alliance for the West, FEC ID # C00335133. [File Image]

G. On October 14: \$1,000 to John Doolittle, candidate for the U.S. House of Representatives, 4th Congressional District of California, FEC ID # C00242768. [File image]

H. On October 29: \$1,000 to Maria Guadalupe Garcia, candidate for the House of Representatives, 51st Congressional District of California, FEC ID # C00378984. [File Image]

I. On October 31: \$5,000 to Rely on Your Beliefs Fund, FEC ID# C00344648. [File Image]

5. Upon information and belief, including verifying with FEC Informational staff via telephone as to the 2002 Great Northwest Classic Committee, all these committees are federal committees and any contribution to these committees counts toward the aggregate limit set forth in 2 U.S.C. §441(a)(3).

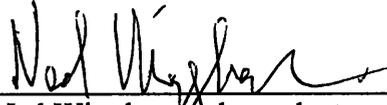
6. The contributions to federal committees which are listed above total \$28,000 for the year 2002, violating the \$25,000 aggregate limit set forth in 2 U.S.C. §441(a)(3), which was applicable prior to the passage of the Bipartisan Campaign Reform Act of 2002.

7. Mr. Adams used variations on his name, employer, and address, helping his violation of the \$25,000 aggregate limit escape unnoticed. For names, he listed William Adams, William B. Adams, and William B. Adams Jr. For employers, he listed Hire Capital and Eco Sort Systems. For addresses, he used 731 Adella Avenue and 629 Avenue A, both in Coronado, California.

8. While the name variations used by Mr. Adams suggests the possible coincidence that the contributions were made by different persons with similar names that lived two blocks from each other in Coronado, that possibility is reduced by the listing of the same address (629 A Avenue) at least once for each of the name variations on the contribution filings.

RELIEF

9. TheRestofUs.org respectfully requests that the Federal Elections Commission investigate this matter and take appropriate enforcement action.



Ned Wigglesworth, analyst
TheRestofUs.org
1107 9th Street, Suite 601
Sacramento, CA 95814
916-446-4741

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CALIFORNIA JURAT WITH AFFIANT STATEMENT

State of California

County of Yolo } ss.

See Attached Document (Notary to cross out lines 1-6 below)

See Statement Below (Lines 1-5 to be completed only by document signer[s], not Notary)

~~_____

_____~~

Ned Wiggleworth
Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

2006 FEB - 6 A 10: 09
OFFICE OF GENERAL COUNSEL
FEDERAL

Subscribed and sworn to (or affirmed) before me on this

27th day of January, 2006, by
Date Month Year

(1) Ned Wiggleworth
Name of Signer

Personally known to me

Proved to me on the basis of satisfactory evidence to be the person who appeared before me (.) (,)
(and

(2) _____
Name of Signer

Personally known to me

Proved to me on the basis of satisfactory evidence to be the person who appeared before me.)

[Signature]
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Further Description of Any Attached Document

Title or Type of Document: PEC Complaint - Adams

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

RIGHT THUMBPRINT OF SIGNER #1
Top of thumb here

RIGHT THUMBPRINT OF SIGNER #2
Top of thumb here

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