



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

June 12, 2009

Luis R. Vera  
Ciro Rodriguez for Congress  
P.O. Box 14528  
San Antonio, TX 78214

Re: ADR 495 (RAD 09L-18)  
Ciro Rodriguez for Congress and Luis R. Vera, Treasurer

Dear Mr. Vera:

The Reports Analysis Division of the Federal Election Commission (FEC or Commission) determined that matters arising from its recent review of reports filed by **Ciro Rodriguez for Congress** warranted further examination for possible violation of the Federal Election Campaign Act of 1971, as amended. The Commission, thereafter, reviewed the file and assigned this matter to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with **Ciro Rodriguez for Congress and Luis R. Vera, Treasurer (Respondents or the Committee)**. The ADR Program provides Respondents with an opportunity to negotiate, and if necessary, mediate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations and/or mediation are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the Program, i.e., negotiation and/or mediation, you must: 1) indicate in writing a willingness to have your case submitted to the ADR process; 2) agree to participate in the bilateral negotiations and if necessary, mediation; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

The Reports Analysis Division referred **Ciro Rodriguez For Congress and Luis R. Vera, Treasurer (Respondents or the Committee)** for a series of reporting errors and other FECA violations during the 2008 election cycle. A political committee may be referred if, after an

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
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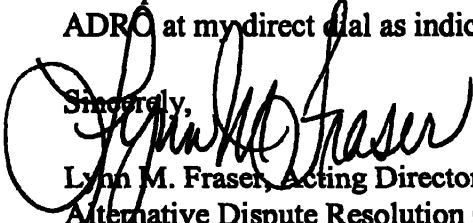
internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's errors included, among other things: failures to itemize contributions; mathematical discrepancies; excessive or prohibited contributions; failures to itemize disbursements; failures to disclose all categories of administrative expenses; and failures to itemize debt.

We have attached a list of the relevant errors in each report for your convenience.

If after reviewing this letter and the enclosed brochure, which describes the ADR program, Respondent(s) would like this case selected for ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days of receipt of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 495**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,

  
Lynn M. Fraser, Acting Director  
Alternative Dispute Resolution Office  
202-694-1665

Enclosures: Brochure  
Commitment to Submit Matter to ADR  
Designation of Representative/Counsel  
Violations Chart

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Excessive and Prohibited Contributions	2007 Q1	Schedule A of the Committee's report disclosed the receipt of excessive and prohibited contributions totaling \$14,000.00 from three (3) political committees and two (2) prohibited sources.
Excessive and Prohibited Contributions	2008 Q1	Schedule A of the Committee's report disclosed the receipt of excessive and prohibited contributions totaling \$24,268.32 from twenty-five (25) individuals and twelve (12) political committees.
Mathematical Discrepancies	2007 Q1	<p>The Committee's report contained two (2) mathematical discrepancies totaling \$1,011,016.63.</p> <ul style="list-style-type: none"> <li>•The Committee failed to correct a \$1,010,516.63 election cycle-to-date discrepancy for Lines 6(a), 6(c), 7(a), 7(c), 11(a)(iii), 11(b), 11(c), 11(d), 11(e), 16, 17 and 22 of the Summary and Detailed Summary Pages.</li> <li>•The Committee failed to correct an aggregate election cycle-to-date total of \$500.00 for one (1) individual.</li> </ul>
Mathematical Discrepancies	2007 Q2	<p>The Committee's report contained one (1) mathematical discrepancy totaling \$1,295,078.25.</p> <ul style="list-style-type: none"> <li>•The Committee failed to correct a \$1,295,078.25 election cycle-to-date discrepancy for Lines 6(a), 6(c), 7(a), 7(b), 7(c), 11(a)(iii), 11(b), 11(c), 11(d), 11(e), 14, 16, 17, and 22 of the Summary and Detailed Summary Pages.</li> </ul>
Mathematical Discrepancies	2007 Q3	<p>The Committee's report contained four (4) mathematical discrepancies totaling \$1,302,078.25.</p> <ul style="list-style-type: none"> <li>•The Committee failed to correct a \$1,295,578.25 election cycle-to-date discrepancy for Lines 6(a), 6(b), 6(c), 7(a), 7(c), 11(a)(iii), 11(b), 11(c), 11(d), 11(e), 16, 17, 20(a), 20(d) and 22 of the Summary and Post-Election Detailed Summary Pages.</li> <li>•The Committee failed to correct a \$500.00 discrepancy for contribution refunded on Line 20(a) for one (1) corporation.</li> <li>•The Committee failed to correct a \$5,000.00 discrepancy for a contribution refunded on Line 20(c) for one (1) political action committee.</li> <li>•The Committee failed to correct an aggregate election cycle-to-date total of \$1,000.00 for one (1) individual.</li> </ul>

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Mathematical Discrepancies	2007 YE	<p>The Committee's report contained two (2) mathematical discrepancies totaling \$1,296,578.25.</p> <ul style="list-style-type: none"> <li>•The Committee failed to correct a \$1,296,078.25 election cycle-to-date discrepancy for Lines 6(a), 6(b), 6(c), 7(a), 7(c), 11(a)(iii), 11(b), 11(c), 11(d), 11(e), 16, 17, 20(a), 20(d), 21 and 22 of the Summary and Detailed Summary Pages.</li> <li>•The Committee failed to correct an aggregate election cycle-to-date total of \$250.00 for one (1) individual.</li> </ul>
Mathematical Discrepancies	2008 Q1	<p>The Committee's report contained three (3) mathematical discrepancies totaling \$1,301,853.25.</p> <ul style="list-style-type: none"> <li>•The Committee failed to correct a \$1,290,313.25 election cycle-to-date discrepancy for Lines 6(a), 6(b), 6(c), 7(a), 7(c), 11(a)(iii), 11(b), 11(c), 11(d), 11(e), 16, 17, 20(a), 20(d), 21 and 22 of the Summary and Detailed Summary Pages.</li> <li>•The Committee's beginning cash balance was less than the ending cash balance of the previous report, a discrepancy of \$4,135.00.</li> <li>•The Committee failed to correct an aggregate election cycle-to-date discrepancy of \$250.00 for one (1) individual.</li> </ul>
Mathematical Discrepancies	2008 30G	<p>The Committee's report contained one (1) mathematical discrepancy totaling \$102,543.34.</p> <ul style="list-style-type: none"> <li>•The Committee failed to correct a \$102,543.34 election cycle-to-date discrepancy for Lines 6(a), 6(b), 6(c), 7(a), 7(b), 7(c), 11(a)(iii), 11(b), 11(c), 11(e), 14, 16, 17, 20(a), 20(d), 21 and 22 of the Summary and Post-Election Detailed Summary Pages.</li> </ul>
Failure to Provide Schedules	2007 Q1	<p>On Schedule D, the Committee disclosed two (2) debts with beginning balance discrepancies totaling \$8,500.00. One (1) debt owed by the Committee had a \$0.00 closing balance on the prior report and a \$7,500.00 opening balance on this report. One (1) debt owed to the Committee was not disclosed on the previous report and showed a \$1,000.00 opening balance on the current report.</p>
Failure to Provide Schedules	2007 Q2	<p>On Schedule D, the Committee disclosed one (1) debt with a beginning balance discrepancy totaling \$7,470.00. The debt owed by the Committee showed a \$7,500.00 closing balance on the previous report and disclosed a \$30.00 opening balance on the current report.</p>

<p><b>Failure to Provide Schedules</b></p>	<p>2008 Q1</p>	<p>The Committee's aggregate election cycle-to-date totals for one (1) individual contributor and twelve (12) political committees on Schedule A were \$48,250.00 greater than the total amount of itemized contributions received from those contributors over the election cycle.</p> <p>The Committee failed to file the required 48 Hour Notices for contributions of \$1,000.00 or more received from February 14, 2008 through March 1, 2008 totaling \$79,600.00.</p>
<p><b>Failure to Properly Itemize Contributions from Individuals</b></p>	<p>2007 Q1</p>	<p>The Committee failed to provide the identification for 28 of 75 contributions from individuals that required itemization.</p>
<p><b>Failure to Properly Itemize Disbursements</b></p>	<p>2007 Q1</p>	<p>The Committee failed to provide an adequate purpose of disbursement and/or the address and/or the name of the original vendor for credit card payments and staff reimbursements for 20 of 50 disbursements requiring itemization.</p>
<p><b>Failure to Properly Itemize Debts</b></p>	<p>2007 Q1</p>	<p>The Committee failed to disclose the purpose for \$8,000.00 in debts itemized on Schedule D.</p>

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