



B E C K E R
E N T E R P R I S E S

OFFICE OF GENERAL
COUNSEL

November 13, 2015

RESPONSE

MUR # 6986

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

Re: Danny Tarkanian
US Congress Candidate
ID #: H2NV04045 / NV CD3

To Whom It May Concern:

I received a copy of the enclosed unanimous letter dated October 21, 2015 which was mailed to you from a concerned citizen regarding possibly campaign fund raising violations from Mr. Tarkanian.

In response to item #3, Ernest A. Becker IV does not hold any equity in Becker Enterprises, L.L.C. The donation from Mr. Becker IV and the donation from Becker Enterprises, L.L.C. should be considered separate donations and cannot be considered illegal under Contribution Limits and/or Prohibited Contributions.

Should you need any further information, please do not hesitate in contacting me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barry W. Becker'.

Barry W. Becker
Manager

10/21/2015

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

RE: Inquiry for possible FEC campaign fund raising violations from Danny Tarkanian for US Congress NV CD3

Dear Federal Election Commission Members,

As a concerned citizen and upon review of the individual contributions to the Danny Tarkanian US Congress Candidate ID H2NV04045, I have found possible inappropriate campaign fund raising activity that should warrant a further inquiry.

1. On September 12, 2015, Rich Abajian made an individual contribution totaling \$2,500 via Transaction ID number SA11AI.A4606902.0.
 - a. Upon further investigation, Mr. Abajian might have an equity holding within a company that has also contributed funds. If organization documents show any interest to this company, then these contributions could be considered illegal under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>:
 - i. Findlay Toyota contributions totaling \$2,500 via Transaction ID number SA11AI.C4606902. Furthermore, these funds could be ineligible and illegal should his allocated contribution interests added up to more than \$200 of said entity. See <http://www.gpo.gov/fdsys/pkg/CFR-2014-title11-vol1/xml/CFR-2014-title11-vol1-sec110-1.xml>
2. On September 4, 2015, Philip Smith Richards contributed a \$1,500 contribution via Transaction ID number SA11AI.C4606746.
 - a. Upon further investigation, it is unclear if he is also principal to the below company. Although the total contributions would not be considered illegal under **Contribution Limits**, there may be a possible violation under **Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>:
 - i. Advanstaff HR - Client Services Inc. contribution of \$250 via Transaction ID number SA11AI.C4606061
3. On August 18, 2015, Ernst A Becker IV made an individual contributions totaling \$1,000 via Transaction ID number SA11AI.C4605839.
 - a. Upon further investigation, he might have an equity holding position within a company that also contributed funds. If their organization documents show any interest to the company below, then

future contributions over \$2,700 aggregate could be considered illegal under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>:

- i. Becker Enterprises LLC contributions totaling \$1,000 via Transaction ID number SA11AI.C4605660
4. On August 30, 2015, Boulevard Ventures LLC contributed a \$1,000 contribution via Transaction ID number SA11AI.C4606618. There may be a possible violation under **Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>.
5. On August 21, 2015, CDF Property Holdings LLC contributed a \$5,000 contribution via Transaction ID number SA11AI.C4605996. There may be a possible violation under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>. If the company is trying to consider themselves as a PAC to maximize their contributions, is the company registered as a PAC? There is no evidence on the FEC listings that this is a registered federal PAC.
6. On September 30, 2015, Ray Chenoweth and Elaine Chenoweth each contributed a \$2,500 contributions via Transaction ID numbers SA11AI.A4607694.0, SA11AI.A4607694.1, SA11AI.A4607694.2, and SA11AI.A4607694.3.
 - a. Upon further investigation, it is unclear if they are also principals to the below company. The total contributions would be considered illegal under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>:
 - i. Nellis Cab Co. contribution of \$5,000 via Transaction ID numbers SA11AI.RD4607694.0 and SA11AI.C4607694 There is no evidence on the FEC listings that this is a registered federal PAC. If Nellis Cab Co. has any government contracts or foreign national members within their organization, this could be an illegal act per 11 CFR 115.4 and/or 11 CFR 110.20
7. On August 21, 2015; Donna Findlay and Clifford Findlay each contributed a \$2,500 contributions via Transaction ID numbers SA11AI.A4605996.0 and SA11AI.A4605996.1.
 - a. Upon further investigation, it is unclear if they are also principals to the below company. The total contributions would be considered illegal under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>:
 - i. Findlay Toyota contribution of \$2,500 via Transaction ID number SA11AI.C4606902 There is no evidence on the FEC listings that this is a registered federal PAC. Findlay

Toyota is also not a recognized entity by the Nevada Secretary of State. Furthermore, these funds could be ineligible should his allocated contribution interests added up to more than \$200 of said entity. See <http://www.gpo.gov/fdsys/pkg/CFR-2014-title11-vol1/xml/CFR-2014-title11-vol1-sec110-1.xml>

8. On September 30, 2015, Jalisco Cantina No. 1 contributed a \$250 contribution via Transaction ID number SA11AI.C4607703. There may be a possible violation under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>. If the company is trying to consider themselves as a PAC to maximize their contributions, is the company registered as a PAC? There is no evidence on the FEC listings that this is a registered federal PAC. Jalisco Cantina No. 1 is also not a recognized entity by the Secretary of State. If Jalisco Cantina No. 1 has any government contracts or foreign national members within their organization, this could be an illegal act per 11 CFR 115.4 and/or 11 CFR 110.20
9. On September 10, 2015, Kazanjian Beverly Hills contributed a \$2,413.02 contribution via Transaction ID number SA11AI.C4606856. There may be a possible violation under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>. If the company is trying to consider themselves as a PAC to maximize their contributions, is the company registered as a PAC? There is no evidence on the FEC listings that this is a registered federal PAC. There is no evidence that Kazanjian Beverly Hills is a registered entity with the California Secretary of State. If Kazanjian Beverly Hills has any government contracts or foreign national members within their organization, this could be an illegal act per 11 CFR 115.4 and/or 11 CFR 110.20
10. On September 30, 2015, Michael R. Pontoni, LTD. contributed a \$250 contribution via Transaction ID number SA11AI.C4607702. There may be a possible violation under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>. If the company is trying to consider themselves as a PAC to maximize their contributions, is the company registered as a PAC? There is no evidence on the FEC listings that this is a registered federal PAC. This entry does not list Occupation or Employer if this is an individual employee of this Nevada entity.
11. On August 11, 2015, TLC, A California Partnership contributed a \$1,000 contribution via Transaction ID number SA11AI.C4605715. There may be a possible violation under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>. If the company is trying to consider themselves as a PAC to maximize their contributions, is the company registered as a PAC? There is no evidence on the FEC listings that this is a registered federal PAC. There is no evidence on the FEC listings that this is a registered federal PAC. The address listed belongs to a Paper Pulp & Film Inc. and TLC A California Partnership is not a registered entity with the California Secretary of State.

12. On July 7, 2015, The Saitta Family Trust contributed a \$350 contribution via Transaction ID number SA11AI.C4603763. There may be a possible violation under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>. If the company is trying to consider themselves as a PAC to maximize their contributions, is the company registered as a PAC? There is no evidence on the FEC listings that this Trust is a registered federal PAC, however there is a Thomas Saitta individual \$400 contribution of via Transaction ID: SA11AI.C4607493.
13. On September 23rd, 25th, and 29th, 2015, Nick Zinkin, Dwayne Zinkin and Harold Zinkin each made individual maximum contributions totaling \$2,700 via Transaction ID numbers SA11AI.C4607965, SA11AI.C4607480 and SA11AI.C4607729.
 - a. Upon further investigation, he might have an equity holding position within a company that also contributed funds. If their organization documents show any interest to the company below, then these contributions could be considered illegal under **Contribution Limits and/or Prohibited Contributions** as stated in <http://www.fec.gov/pages/brochures/fecfeca.shtml#anchor257909>:
 - i. Zinkin Entertainment contribution totaling \$2,700 via Transaction ID number SA11AI.C4607502. There is no evidence on the FEC listings that this is a registered federal PAC. There is a Zinker Property Management Company of Fresno, Inc. as a registered entity in the California Secretary of State. If Zinkin Entertainment has any government contracts or foreign national members within their organization, this could be an illegal act per 11 CFR 115.4 and/or 11 CFR 110.20

These multiple examples of potentially illegal contributions are disturbing in a Federal Candidate Congressional Committee. Candidates who violate Federal Election Commission laws should not be allowed to continue to receive contributions that circumvent regulations to prevent the appearance of impropriety or potential corruption of our election laws. How can we trust them to lawfully carry out their Constitutional duties if they violate clearly defined laws to win the elected office?

Furthermore, there are other entries that are not verifiable such as citizenship status, government contractors prohibitions, banking entities prohibitions, or legitimacy other accurate reported full disclosure of all contributions. Since this candidate is a licensed attorney and his Treasurer, Richard M. Egan, appears to be a political accounting and disclosure service it is even more disturbing that these types of filings were submitted.

We are looking forward to a thorough and complete investigation to clarify the possible unlawful activity by this campaign.

Thank you.