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May 5, 2003

VIA FACSIMILE

April Sands, Esq.
Federal Election Commission
999 E Street, NW
Washington, DC 20463-0001

Re: MUR 5357/Centex Corporation

Ms. Sands:

As you know, we filed a consolidated Response on behalf of Ted Adams, Gary Glenewinkel, Albert Petrangeli, Raymond Southern and Michael Wood on April 29, 2003 regarding the above-referenced matter.

I write to make two small clarifications to that submission. First, I would like to correct a typographical error found in our original submission on page four, paragraph one regarding the political contributions Gary Glenewinkel was reportedly reimbursed for by Centex Rooney. While the original submission says that Mr. Glenewinkel was reimbursed "for a single \$1,000 contribution in 2000", it should have said Mr. Glenewinkel was reimbursed "for a single \$1,000 contribution in 2002".

In addition, I would like to clarify that the political contributions allegedly reimbursed by Centex Rooney to Mr. Glenewinkel via his Fiscal Year 2000 bonus included the following contributions from 1999 and 2000:

- 1999 – \$500 contribution to McCollum for Senate, \$500 contribution to ABC/PAC, \$500 contribution to Corrine Brown for Congress and \$500 contribution to Bush for President
- 2000 – \$500 contribution to Gallagher for Senate, \$1,000 contribution to Shaw for Congress, \$1,000 contribution to McCollum for Senate and \$100 contribution to Bush for President

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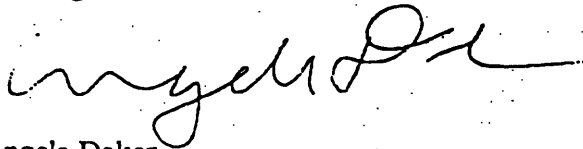
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Mr Glenewinkel's bonus for Fiscal Year 2000 that reportedly included reimbursements for the above-mentioned 1999 and 2000 contributions was

If you have any questions, please do not hesitate to contact me at (305) 995-5297.

Best regards,



Angela Daker

23 04 406 3247

SWORN STATEMENT OF TED ADAMS

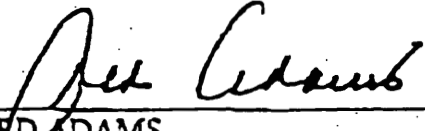
1. My name is Ted Adams. I have been Senior Vice President and Criminal Justice Divisions Manager of Centex Rooney Construction Company, Inc. since 1996.
2. I have recently been told that I was reimbursed by the Company in my bonus for Fiscal Year 2000, for a \$500 contribution I made to Bush for President in 1999.
3. My total bonus for Fiscal Year 2000 was _____ I received this bonus in three separate checks, none of which indicated that I received reimbursement for my political contribution to the Bush campaign.
4. I had no idea that Centex Rooney paid me a grossed-up, dollar for dollar reimbursement for the 1999 Bush contribution. Indeed, I was never told all factors considered when determining the amount of my bonus for 2000, or any other year.
5. Between 1998 and present, I was responsible for making certain my business unit met its minimum business goals. I knew that I would not receive a bonus at all if my business unit did not meet its minimum numbers for the year. Fortunately, I always met, and far exceeded, the minimum goals for my business unit.
6. Bob Moss – former Chairman of Centex Rooney and former Chief Executive Officer of Centex Construction Group – encouraged political contributions, but I was not forced by Mr. Moss, or anyone else at Centex Rooney, to make any political contributions. I made my political contribution to President Bush of my own volition, and would do so again today.
7. I understood that the Company looked favorably upon those who made political contributions, and wanted to track contributions, charitable donations, and community involvement of managers. Thus, I sent a copy of my 1999 \$500 check for President Bush to Gary Esporin – Senior Vice President and Co-Chief Financial Officer of Centex Construction Group.
8. I did not intend to violate any laws when I made the contribution to Bush in 1999, or when I sent a copy of my check for that contribution to Mr. Esporin.
9. I never entered into any agreement with anyone to violate federal campaign contribution laws. I never knew that my actions with regard to the Bush contribution in 1999, and receipt of my bonuses from the Company, involved any potential wrongful, or even questionable, behavior.
10. I did not knowingly or willfully violate any federal campaign contribution laws at any time.

2004-06-30

11. I was not involved in any way in devising, implementing or approving bonuses for managers at Centex Rooney.

12. At the Company's request, I have paid back the monies with interest that I am told were reimbursed to me for my 1999 \$500 contribution to the Bush campaign.

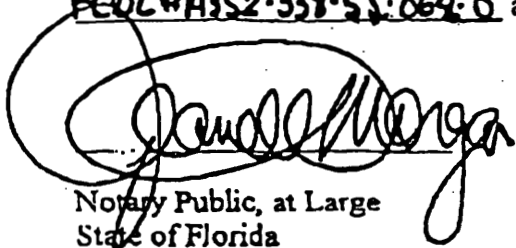
FURTHER AFFIANT SAYETH NOT


TED ADAMS

STATE OF Florida

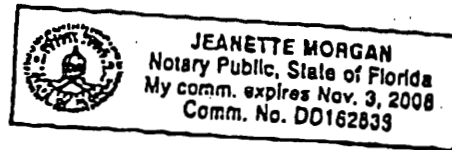
COUNTY OF Morgan

The foregoing instrument was acknowledged before me this 29th day of April, 2003 by Ted Adams, who is personally known to me or who has produced FLDL#A352-338-55-064-0 as identification and who did take an oath.



Notary Public, at Large
State of Florida

Jeanette Morgan
Print Name



23.04.406.3249

SWORN STATEMENT OF GARY GLENEWINKEL

1. My name is Gary Glenewinkel. I currently am Executive Vice President and Chief Operating Officer at Centex Rooney Construction Company, Inc.
2. I commonly make political contributions, and have contributed to various political campaigns over the years.
3. I have recently been told that I was reimbursed by the Company, in my bonuses for Fiscal Years 2000 through 2002, for a number of political contributions. I have been told that I was reimbursed for the following contributions I made in 1999: a \$500 contribution to Corrine Brown for Congress, a \$500 contribution to McCollum for Senate, a \$500 contribution to Bush for President and a \$500 contribution to ABC/PAC. I was further told I was reimbursed for my contributions in 2000 of \$500 to Gallagher for Senate, \$1,000 to Shaw for Congress, \$500 to McCollum for Senate and \$100 to Bush for President. I was also told I was reimbursed for my \$100 contribution to ABC/PAC in 2001, and my \$1,000 contribution to Shaw for Congress in 2002.
4. My bonuses for Fiscal Years 2000, 2001, and 2002 were respectively . I did not know that Centex Rooney reimbursed me for campaign contributions in the bonuses I received for those years.
5. I frequently received requests from my clients to make contributions to various political campaigns. I consider it good for my business unit to attend fundraisers and make contributions when I support the candidate. Thus, I made various political contributions over the years of my own volition. I viewed these political contributions as reflecting well upon my business unit within the Company.
6. I did not expect to be reimbursed by Centex Rooney for the political contributions I made. I did not make any political contributions with the intent of being reimbursed by Centex Rooney, or with the intent to violate any federal law. I was never told that I would be reimbursed by the Company for my political contributions. Moreover, I knew that my bonus for each year depended upon the success of the business for that year, and I could potentially receive no bonus for any given year if the business goals for my unit were not met.
7. I forwarded copies of checks that I wrote for political contributions to Gary Espornin – Senior Vice President and Co-Chief Financial Officer of Centex Construction Group – because I understood that the Company looked favorably upon those who made political contributions, and such contributions would be considered as one factor when decisions were made regarding business development and business unit success. I never thought there was a correlation between my political contributions and my bonuses.
8. I never saw any document itemizing the composition of my bonus for any year, and I was never told all of the factors taken into consideration when determining the amount of my bonuses.

03 04 46 350

9. I now understand that reimbursements for my political contributions were contained in my Discretionary Management bonuses each year.

10. I was not involved in devising, implementing or approving Discretionary Management Bonuses for senior managers at Centex Rooney. I never questioned, and I was never told, how the Discretionary Management Bonuses were calculated.

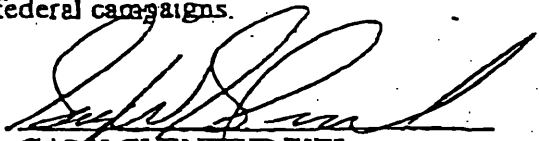
11. I did not know that my receipt of Discretionary Management Bonuses, and forwarding the paperwork for the above referenced contributions to Mr. Esporin was potentially wrongful, or even questionable. I did not intend to violate any laws when I made any political contributions, or when I sent copies of my checks for political contributions to Mr. Esporin. I further did not intend to violate any laws by accepting my Discretionary Management Bonuses from the Company. I never entered into any agreement with anyone to violate the federal campaign contribution laws.

12. Further, I did not intend to violate the law by writing D.J. McGlothern a check on April 3, 2000 for contributions he made on his own behalf. I did not intend for Mr. McGlothern to make donations for me in his name, and I did not require that Mr. McGlothern make the donations. Further, I did not think it was wrong to write Mr. McGlothern a check for contributions he made on his own behalf. Simply put, Mr. McGlothern was less well-compensated than me, and, as his boss, I did not want him to incur unnecessary out of pocket expenses. Again, I had no idea that federal law prohibited my reimbursement of Mr. McGlothern for a donation he made on his own behalf.

13. When I submitted copies of my check to Mr. McGlothern, and Mr. McGlothern's checks to political candidates, to Mr. Esporin, I did not intend to be reimbursed for the check I wrote to Mr. McGlothern. Instead, I simply wanted to keep the Company informed of the political contributions that were being made by members of my business unit since political contributions reflected well on the unit as a whole.

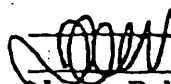
14. At the Company's request, I have paid back with interest the monies I am told were reimbursed to me for contributions to federal campaigns.

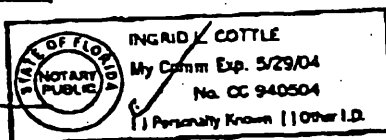
FURTHER AFFIANT SAYETH NOT


GARY GLENEWINKEL

STATE OF Florida
COUNTY OF Broward

The foregoing instrument was acknowledged before me this 24th day of April, 2003 by Gary Glenewinkel, who is personally known to me or who has produced _____ as identification and who did take an oath.


Notary Public, at Large
State of Florida
Ingrid Kottle
Print Name



23 04 406 3251

SWORN STATEMENT OF ALBERT PETRANGELI

1. My name is Albert Petrangeli. I have been President of Centex Rooney Construction Company, Inc. since 2000.
2. I was recently informed that I was reimbursed by the Company, in my bonus for Fiscal Year 2000, for a \$500 contribution I made to Welden for Congress in 2000.
3. My total bonus for Fiscal Year 2000 was
4. I never saw documentation itemizing the composition of my bonus for Fiscal Year 2000 or any other year. There was no indication in my bonus payment for Fiscal Year 2000 that I received reimbursement for my 2000 contribution to Welden.
5. I made my political contribution to Welden in 2000 of my own volition. No one at Centex Rooney forced me to make any political contributions.
6. At the direction of Bob Moss – former Chairman of Centex Rooney and former Chief Executive Officer of Centex Construction Group – I forwarded a copy of the check I wrote for my contribution to Welden in 2000 to Gary Esporin – Senior Vice President and Co-Chief Financial Officer of Centex Construction Group.
7. I did not intend to violate any laws when I made the \$500 contribution to Welden in 2000, or when I sent a copy of my check for that contribution to Mr. Esporin. I was never told there would be a dollar for dollar reimbursement for my 2000 Welden contribution, or that the \$500 contribution would be grossed-up for federal tax purposes. Moreover, as set forth above, I did not know that I actually received a grossed-up reimbursement for the Welden contribution. Finally, and perhaps most importantly, I believed that I would not receive any bonus payments for a given year if my business unit did not meet its minimum financial targets.
8. I did not knowingly or willfully violate any federal campaign contribution laws at any time. I never entered into any agreement with anyone to violate the federal campaign contribution laws. I never knew that my contribution to the Welden campaign, my forwarding of the Welden check to Mr. Esporin, and my receipt of bonuses from the Company involved any wrongful, or even questionable, behavior.
9. I understand that my contribution to Welden was reimbursed in my Discretionary Management Bonus. I was not involved in any way in devising, implementing or approving Discretionary Management Bonuses at Centex Rooney.

23 194 406 3252

10. At the Company's request, I have paid back with interest the monies I am told were reimbursed to me for the contribution to Welden in 2000.

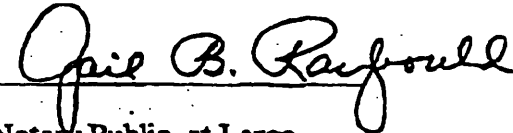
FURTHER AFFLIANT SAYETH NOT

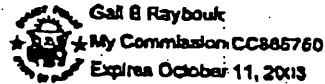

ALBERT PETRANGELI

STATE OF FLORIDA

COUNTY OF BERNARD

The foregoing instrument was acknowledged before me this 28th day of April, 2003 by Albert Petrangeli, who is personally known to me or who has produced _____ as identification and who did take an oath.


Notary Public, at Large
State of Florida



GAIL B. RAYBOULD
Print Name

23 04 406 3253

SWORN STATEMENT OF RAYMOND SOUTHERN

1. My name is Raymond Southern. I have been Vice Chairman and Chief Executive Officer at Centex Rooney Construction Company, Inc. since 2000.
2. I have recently been told that I was reimbursed by the Company in my bonus for Fiscal Year 2000 for a \$1000 contribution to Bush for President in 1999 and a \$500 contribution to Gallagher for Senate in 2000. I did not know that Centex Rooney reimbursed me for these contributions.
3. My total bonus for Fiscal Year 2000 was
4. There was no indication in my bonus payments for Fiscal Year 2000 that a reimbursement for my contributions to Bush and Gallagher occurred.
5. I made my political contributions to President Bush in 1999 and Gallagher in 2000 of my own volition, and was not forced to make any contributions by anyone at Centex Rooney.
6. I forwarded copies of the checks that I wrote for my contributions to Bush and Gallagher to Gary Esporin - Senior Vice President and Co-Chief Financial Officer of Centex Construction Group - because I understood that Mr. Moss - former Chairman of Centex Rooney and former Chairman and Chief Executive Officer of Centex Construction Group, Inc. - looked favorably upon those who made political contributions.
7. More specifically, it was my understanding that Mr. Moss wanted to be kept abreast of all political contributions made by Centex Rooney management level employees. I believed that when this information was forwarded to Mr. Esporin, he could thus keep track of managers who made political contributions, and the campaigns that received the contributions. I never knew that Mr. Esporin used documentation of political contributions to calculate and make dollar for dollar reimbursement payments that were grossed up for tax purposes.
8. I did not intend to violate any laws when I made the contributions to Bush in 1999 and Gallagher in 2000, or when I sent copies of my checks for those contributions to Mr. Esporin.
9. Apparently, the two campaign contribution reimbursements referenced above were paid as part of my Discretionary Management Bonus in Fiscal Year 2000.
10. I was not involved in devising, implementing or approving the Discretionary Management Bonuses for myself or for other managers at Centex Rooney.

11. Mr. Moss was solely responsible for making determinations regarding Discretionary Management Bonus amounts. I did not have the authority to review or approve Mr. Moss' determinations regarding Discretionary Management Bonus amounts, and thus, my signature on the 2001 spreadsheet (AP - 008) was simply an indication that I had calculated and approved the figures for the other six categories on the spreadsheet that were, in fact, my responsibility in Fiscal Year 2001. There was no indication that the Discretionary Management Bonus amounts established by Mr. Moss included reimbursements for political contributions.

12. Since I reported to Mr. Moss, I never felt it was my place to question how Discretionary Management Bonuses were calculated. Discretionary Management Bonuses were the exclusive province of Mr. Moss, and he did not share the details of his decision-making process with me.

13. I never entered into any agreement with anyone to violate the federal campaign contribution laws. I never knew that my actions with regard to the political contributions I made, and receipt of my bonuses from the Company, involved any potentially wrongful, or even questionable behavior.

14. I did not knowingly and willfully violate any federal campaign contribution laws at any time.

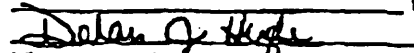
15. At the Company's request, I have paid back with interest the monies I am told were reimbursed to me for my \$1000 contribution to Bush in 1999 and my \$500 contribution to Gallagher in 2000.


FURTHER AFFIANT SAYETH NOT


RAYMOND SOUTHERN

STATE OF Florida
COUNTY OF Sevier

The foregoing instrument was acknowledged before me this 29 day of April, 2003 by Raymond Southern, who is personally known to me or who has produced as identification and who did take an oath.


Notary Public, at Large
State of Florida
Delana J. Hughes
Print Name

 Delana J. Hughes
My Commission DC782070
Expires February 02, 2007

SWORN STATEMENT OF J. MICHAEL WOOD

1. My name is J. Michael Wood. I have been Executive Vice President and Chief Operating Officer for North/Central Florida Operations at Centex Rooney Construction Company, Inc. since 2000. Between 1995 and 2000, I was Senior Vice President at Centex Rooney.
2. I have recently been informed that I was reimbursed by Centex Rooney, in my bonus for the Fiscal Year of 2000, for a \$500 contribution to McCollum for Senate in 1997 and a \$500 contribution to McCollum for Senate in 1998. I did not know that Centex Rooney reimbursed me for the McCollum contributions.
3. My total bonus for 2000 was There was no indication in any of my bonus payments for 2000 that a reimbursement for my 1997 and 1998 contributions to McCollum occurred.
4. I never saw any document itemizing the composition of my bonus for any year, and I was never told all of the factors taken into consideration when determining the amount of my bonus. I knew that my receipt of any bonus monies depended on whether the business unit I was responsible for met its yearly minimum business unit goals, and consequently, I could not depend on getting a bonus unless those goals were met.
5. While Bob Moss – former Chairman of Centex Rooney and former Chief Executive Officer of Centex Construction Group – encouraged political contributions, no one at Centex Rooney ever forced me to make any political contribution.
6. I forwarded copies of the two checks I wrote for my contributions to McCollum to Gary Esporin – Senior Vice President and Co-Chief Financial Officer of Centex Construction Group – because I understood that the Company looked favorably upon those who made political contributions, and wanted to keep track of those contributions. I was never told there would be a reimbursement by Centex Rooney for the McCollum contributions.
7. I did not intend to violate any laws when I made the contributions to McCollum in 1997 and 1998, or when I sent copies of my checks for those contributions to Mr. Esporin. I made the contributions to McCollum of my own volition.
8. I never knew or suspected that my actions with regard to the political contributions I made to McCollum, and receipt of my bonuses from the Company, were potentially unlawful.
9. I was not involved in any way in devising, implementing or approving bonuses for senior level employees at Centex Rooney. I have never been responsible for making decisions regarding how bonuses are allocated among senior management employees.

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10. At the Company's request, I have paid back the monies with interest that I am told were reimbursed to me for the 1997 and 1998 contributions to McCollum.

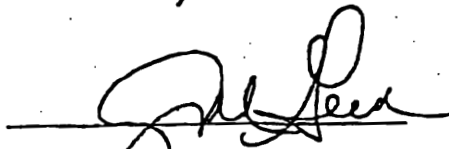
FURTHER AFFIANT SAYETH NOT


J. MICHAEL WOOD

STATE OF Florida

COUNTY OF Orange

The foregoing instrument was acknowledged before me this 28 day of April, 2003 by J. Michael Wood, who is personally known to me or who has produced Personally known as identification and who did take an oath.



Notary Public, at Large
State of Florida



Cindy M. Garris
Print Name

23 04 406 3257