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Date: Thursday, March 15, 2012

To: Attn: Kim Collins
Jeff S. Jordan, Supervisory Attorney
Office of the General Counsel / CELA
Federal Elections Commission

FAX #: 202-219-3923

From: Andreas C. Rockas, Counsel for
Lang, Hansen, O'Malley & Miller

Re: MUR 6529 - Response of Lang, Hansen, et al. to Initial Notice of Complaint

No. of Faxed Pages (including this cover sheet): 5

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VIA U.S. MAIL & FACSIMILE TO: (202) 219-3923

Jeff S. Jordan, Supervisory Attorney
Attn: Kim Collins
Office of the General Counsel / CELA
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

CONFIDENTIAL COMMUNICATION

(See, e.g., 2 U.S.C. § 437g(a)(4)(B) & § 437g(a)(12)(A))

Re: MUR 6529 -- Response of Lang, Hansen, O'Malley & Miller to FEC's Initial Notice of Complaint

Dear Mr. Jordan,

I am acting as counsel for Lang, Hansen, O'Malley & Miller (LHOM) with regard to the above-referenced matter.¹ LHOM is alleged, in the first of five complaint allegations, to have made a contribution in violation of Federal campaign contribution limits to Gloria Negrete McLeod for Congress (the "Committee"). I have spoken briefly with Ms. Kim Collins and Ms. Ruth Heilizer of your office regarding this matter, both of whom have been very courteous and helpful.

Each of the four general partners that possess an ownership interest in LHOM is an individual and not a corporation; LHOM has no other partners. None of the four individual partners have contributed any other funds to the Committee before or since the date of the contributions at issue.

Last year, each of the four individuals, who are also partners of LHOM, agreed to make a contribution of \$2,000 each to the Committee.² They did so by causing an \$8,000 check (dated December 23, 2011 and imprinted with each of their last names) to be sent to the Committee. On

¹ Please see your copy of the Statement of Designation of Counsel faxed to your office on February 27, 2012.

² At all relevant times, the applicable contribution limit with respect to any election for Federal office was \$2,500.

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or about that date, one of the four individual contributors (Joseph Lang), informed Ms. McLeod of the check, and of the four individuals' joint intent that the check amount be attributed in four equal amounts to each of them.

The Committee accepted the joint contribution from the four individual contributors. See 11 CFR § 110.1, subds. (k)(1) and (k)(3)(ii)(B). As a result, the Committee publicly disclosed on its 2011 year-end campaign report that each of the four individuals contributed \$2,000 each. See Exhibit 1 to Complainant's Complaint, consisting of copies of relevant portions of the Committee's 2011 year-end report.

Partial Refund of Original Contributions

Last month, in an abundance of caution, the Committee refunded a total of \$6,000 to the four individuals by way of a Committee check dated February 21, 2012, or 60 days after the four original contributions. See Exhibit A to this correspondence, a copy of the refund check. Thus, at this point in time, each of the four individuals has contributed only \$500 each to the Committee (or only \$2,000 combined).

In light of the above-stated facts, we respectfully request that the FEC take no action and close its file with regard to the relevant allegations made against LHOM, its partners, and/or the Committee.

If you have any questions or require any additional information, please do not hesitate to contact me at your convenience.

Very truly yours,



Andy Rockas

Enclosed: Exhibit A – Copy of refund check from Committee to LHOM dated 2/21/12.

cc: Joseph L. Lang

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