

June 6, 2014

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CELA

Federal Election Commission  
Office of Complaints Examination and Legal Administration  
Attn: Frankie Hampton, Paralegal  
999 E Street, NW  
Washington, DC 20436

**RE: Federal Election Commission Complaint -- MUR #6828**

Dear Mr. Hampton:

I write on behalf of my client, Joe Baca and Friends of Joe Baca 2014, in response to your May 23, 2014 letter regarding MUR 6828 and the FEC complaint filed by Mr. George Alfano. I request that the complaint be dismissed by your office without further investigation because there is no factual or legal basis to conclude that my client violated the law.

The Alfano complaint alleges that "text in the form of a letter from Joe Baca to the reader" was contained in a mail piece disseminated by Cal Voters for Honest Government, thereby resulting in coordinated communications that may have exceeded the \$2,600 federal contribution limit. However, the letter depicted in the mail piece was not written by Mr. Baca and was not part of any campaign material disseminated by his campaign. My client had no knowledge of or involvement in the Cal Voters' mailer.

In sum, the allegations contained in the complaint against Mr. Baca have no basis in fact. There was no coordinated communication between Cal Voters for Honest Government and Mr. Baca's campaign, and therefore no violation of the law was committed by my client.

For the foregoing reasons, we respectfully request that you dismiss the complaint against my client. Please do not hesitate to contact me if you have questions or require additional information.

Very truly yours,

**OLSON HAGEL & FISHBURN LLP**


RICHARD R. RIOS

Law Offices of

OLSON

HAGEL &amp;

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FEDERAL ELECTION COMMISSION  
999 E Street, NW  
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL  
Please use *one* form for each Respondent/Entity/Treasurer.  
FAX (202) 218-3923

MUR # 6828

NAME OF COUNSEL: Richard R. Rios

FIRM: Dison Hagel + Fichburn

ADDRESS: 555 Capitol Mall, Suite 1425

Sacramento Ca 95814

TELEPHONE- OFFICE ( 916 ) 442-2952

FAX ( 916 ) 442-1280

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5/28/14

Date

Joe Baca

Respondent/Agent-Signature

Candidate

Title (Treasurer/Candidate/Owner)

NAMED RESPONDENT: Joe Baca + Friends of Joe Baca 2014

MAILING ADDRESS: 555 Capitol Mall, Suite 1425  
(Please Print)

Sacramento Ca 95814

TELEPHONE- HOME ( ) 916 442-2952

BUSINESS ( 916 )

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentially provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.



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STATEMENT OF DESIGNATION OF COUNSEL  
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