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FEDERAL ELECTION COMMISSION

FEDERAL ELECTION COMMISSION

2017 JAN 17 AM 11: 36

2017 JAN 17 AM 10: 57

FIRST GENERAL COUNSEL'S REPORT

MUR: 6990
COMPLAINT FILED: December 4, 2015
DATE OF NOTIFICATION: December 11, 2015
LAST RESPONSE: February 3, 2016
DATE ACTIVATED: October 20, 2016

ELECTION CYCLE: 2014
Earliest SOL: February 19, 2018
Latest SOL: June 26, 2018

COMPLAINANT: Douglas D. Head

RESPONDENTS:

Friends of Patrick Murphy and Brian Foucart in his official capacity as treasurer	Thomas P. Murphy, Jr. Leslie Murphy
Ami Bera for Congress and Jennifer May in her official capacity as treasurer	Babulal Bera Robert Strouse
Kevin Strouse for Congress and Robert Fader in his official capacity as treasurer	

MUR: 7079
DATE COMPLAINT FILED: June 6, 2016
DATE OF NOTIFICATION: June 13, 2016;
July 19, 2016
LAST RESPONSE: August 2, 2016
DATE ACTIVATED: October 20, 2016

ELECTION CYCLE: 2010; 2012; 2014; 2016
Earliest SOL: December 31, 2014
Latest SOL: April 9, 2020

COMPLAINANT: The Foundation for Accountability and Civic Trust

RESPONDENTS:

Ami Bera for Congress and Jennifer May in her official capacity as treasurer	Amerish "Ami" Bera Babulal Bera
DelBene for Congress and Jay Patterson in his official capacity as treasurer	Kanta Bera Janine Bera
Eggman for Congress and Jay Petterson in his official capacity as treasurer	Suzan DelBene Michael Eggman
Stacey Lawson for Congress and Kevin Heneghan in his in his official capacity	Stacey Lawson Jon Hulburd

NOTIFICATION

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Hulburd for Congress and David Beckham in his official capacity as treasurer	Patrick Murphy Thomas P. Murphy, Jr.
Friends of Patrick Murphy and Brian Foucart in his official capacity as treasurer	Leslie Murphy Scott Peters
Scott Peters for Congress and Nicholas R. Femia in his official in his official capacity as treasurer	Lynn Gorguze Gloria Gorguze
Sangisetty for Congress LLC and Kurt Fakier in his official capacity	Koti Sangisetty Aruna Sangisetty
Friends of Steve Pougnet and Kinde Durkee in her official capacity as treasurer	Ravi Sangisetty Stephen P. Pougnet
Kevin Strouse for Congress and Ronald Fader in his official capacity as treasurer	Kevin Strouse Robert Strouse
Dan Roberti for Congress and Daniel McClutchy in his official capacity as treasurer	Daniel Francis Roberti Dina Titus
Dr. Raul Ruiz for Congress and John Pinkney in his official capacity as treasurer	Dr. Raul Ruiz Loretta Sanchez
Titus for Congress and Jennifer May in her official capacity as treasurer	Manan Trevidi
Trivedi for Congress and Bret Binder in his official capacity as treasurer	
Committee to Re-elect Loretta Sanchez and Katharine Meyer Borst in her official capacity as treasurer ¹	

MUR: 7121
COMPLAINT FILED: August 8, 2016
DATE OF NOTIFICATION: August 15, 2016
LAST RESPONSE: October 11, 2016
DATE ACTIVATED: December 12, 2016

ELECTION CYCLE: 2014
EARLIEST SOL: June 20, 2018
LASTED SOL: June 30, 2018

COMPLAINANT: The Foundation for Accountability and Civic Trust

¹. Several of these political committees terminated before the Complaints were filed in these matters. Where ongoing committees have designated new treasurers, we have substituted those names.

1 **RESPONDENTS:**

2 Eggman for Congress and Jay Petterson Michael Eggman
3 in his official and individual capacity as treasurer Babulal Bera
4 Ami Bera for Congress and Jennifer May
5 in her official capacity as treasurer
6

7 **RELEVANT STATUTES** 52 U.S.C. § 30102(e)(3)(B)
8 **AND REGULATIONS:** 52 U.S.C. § 30104(a)(2)
9 52 U.S.C. § 30116(a)
10 52 U.S.C. § 30116(f)
11 52 U.S.C. § 30122
12 11 C.F.R. § 103.3(b)
13 11 C.F.R. § 104.14(d)
14 11 C.F.R. § 110.4(b)
15

16 **INTERNAL REPORTS CHECKED:** Disclosure Reports

17
18 **FEDERAL AGENCIES CHECKED:** None
19

20 **I. INTRODUCTION**

21 The Complainants in MURs 6990, 7079, and 7121 allege that a number of congressional
22 candidates, their campaign committees, and family members violated the Federal Election
23 Campaign Act of 1971, as amended (the "Act"), and Commission regulations by participating in
24 schemes to make contributions in the names of others for the purpose of evading the Act's
25 individual contribution limits.²

26 MURs 6990 and 7079 involve allegations that the Respondents engaged in a series of
27 "donor swap" schemes.³ The Complaint in MUR 6990 alleges that, during the 2014 election
28 cycle, Thomas P. Murphy, Jr., and Leslie Murphy, the parents of congressional candidate Patrick
29 Murphy, participated in a donor-swapping scheme with the parents of two other congressional

² MUR 6990 Compl. at 1; MUR 7079 Compl. at 1, 3; MUR 7121 Compl. at 1-2.

³ MUR 6990 Compl. at 1; MUR 7079 Compl. at 1, 3.

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1 candidates in which the elder Mr. Murphy reimbursed another parent’s contribution to his son’s
2 campaign and Leslie Murphy permitted her name to be used to make a contribution in the name
3 of another.⁴ The Complaint in MUR 7079 alleges that, between 2009 and 2015, congressional
4 candidate Amerish “Ami” Bera, along with his wife and parents, orchestrated a similar donor-
5 swapping scheme involving the reimbursement of contributions made by fourteen other
6 congressional candidates and their families.⁵ Finally, MUR 7121 involves an allegation that, in
7 June 2013, congressional candidate Michael Eggman and his principal campaign committee,
8 Eggman for Congress, participated in a “straw donor scheme” involving the reimbursement of
9 one contribution by Babulal Bera.⁶

10 The record evidence, however, does not support a finding that any of the Respondents in
11 these three MURs made contributions in the names of others by reimbursing the contributions
12 identified in the Complaints.⁷ Accordingly, we recommend that the Commission find no reason
13 to believe as to all Respondents and close the files in these matters.

⁴ MUR 6990 Compl. at 1.

⁵ MUR 7079 Compl. at 1.

⁶ MUR 7121 Compl. at 1-3.

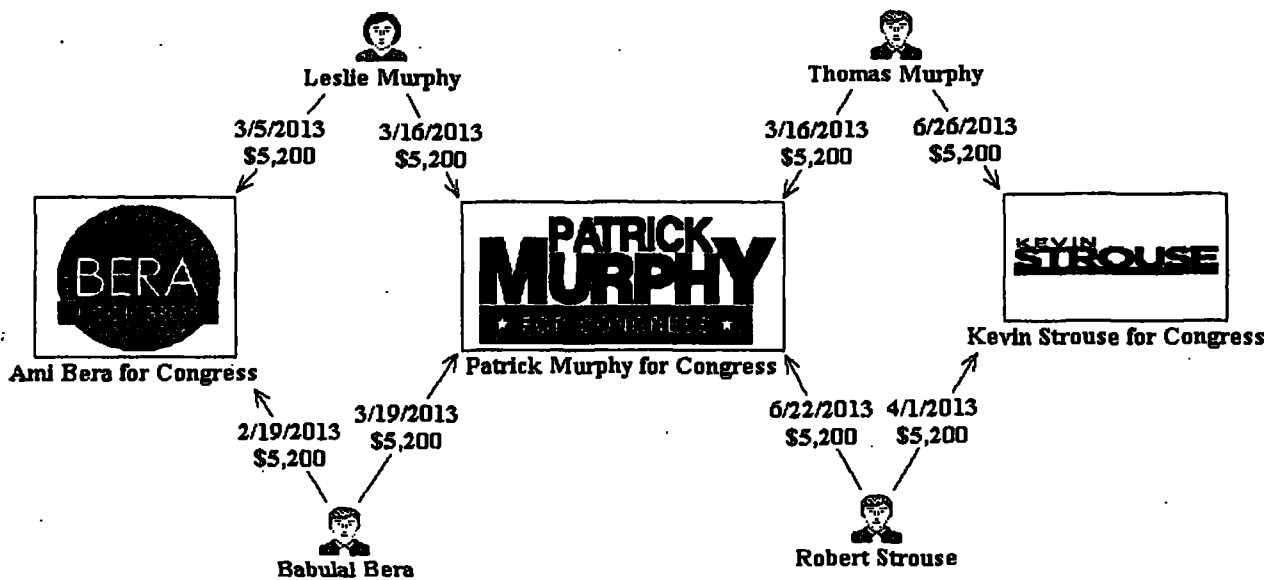
⁷ While the Complaint in MUR 7079 alleges that fourteen candidates, their families, and campaign committees participated in this scheme with members of the Bera family, it provides examples of only four of these donor swaps. A review of the candidate committees’ disclosure reports provided information regarding contributions made by all fourteen candidates, their families, or campaign committees to the Bera Committee and Bera family contributions to the fourteen campaign committees. And, although most of the contributions at issue in MURs 6990, 7079, and 7121 were made by individuals, two were made by committees, Eggman for Congress and Dr. Raul Ruiz for Congress. Contributions that match the activity described in the Complaints are included in the Table attached to this Report. *See* Attachment 1.

1 **II. FACTUAL AND LEGAL ANALYSIS**

2 **A. Background**

3 **1. MUR 6990**

4 MUR 6990 involves contributions by Leslie Murphy and Thomas P. Murphy, Jr., the
5 parents of candidate Patrick Murphy; contributions by Robert Strouse, the father of candidate
6 Kevin Strouse; and contributions by Babulal Bera, the father of candidate Ami Bera,⁸ as shown
7 in the diagram below.⁹



8 Mr. and Mrs. Murphy, Mr. Strouse, and Mr. Bera had each contributed the \$5,200
9 maximum to their children's principal campaign committees for the 2014 primary and general
10 elections.¹⁰ According to the Complaint, the purpose of the scheme was to evade the Act's
11

⁸ See MUR 6990 Compl. at 1-2.

⁹ See also Attachment 1.

¹⁰ See 52 U.S.C. § 30116(a)(1)(A). During the 2014 election cycle, the maximum individual contribution was \$2,600 per election.

1 committees.¹⁷ The Responses also argue that the Commission has previously determined that
2 series of direct contributions, such as those presented in this matter, are lawful as they do not
3 involve the reimbursement of funds used to make the contributions.¹⁸

4 **2. MUR 7079**

5 According to the Complaint in MUR 7079, candidate Ami Bera, his wife, Janine Bera,
6 and his parents, Babulal and Kanta Bera, engaged in a “shell game” during the 2010, 2012, 2014,
7 and 2016 election cycles in which they improperly reimbursed contributions totaling over
8 \$200,000 by swapping contributions with a “network” of fourteen other congressional
9 candidates, their families, and campaign committees for the purpose of magnifying the value of
10 the participants’ contributions “beyond lawful contribution limits.”¹⁹ This scheme allegedly
11 involved the Beras directing the “network” to make contributions to the Bera Committee in
12 exchange for members of the Bera family contributing to the fourteen congressional

¹⁷ Joint Murphy Resp. at 1; Bera Resp. at 1-2; Strouse Resp. at 1.

¹⁸ Joint Murphy Resp. at 1-3; Bera Resp. at 3; Bera Committee Resp. at 2; Strouse Resp. at 2.

¹⁹ MUR 7079 Compl. at 1-2. According to the Complaint, the “complex family shell game” described in MUR 7079 is similar to the reimbursement scheme for which Babulal Bera pleaded guilty and was sentenced to serve a year and a day in prison. *Id.* at 1; *see also* Judgment, *United States v. Babulal Bera*, No. 2:16-cr-00097 (E.D. Cal. Aug. 18, 2016). In that criminal matter, Babulal Bera admitted that he violated 52 U.S.C. §§ 30116(a)(1)(A) and 30122 by reimbursing over 130 contributions made to the Bera Committee using personal and company funds. *See* Criminal Information, *United States v. Babulal Bera*, Crim. No. 5-16-0097 (E.D. Cal. filed May 9, 2016); Plea Agreement, Ex. A, Factual Basis for Plea, *United States v. Babulal Bera*, Crim. No. 5-16-0097 (E.D. Cal. filed May 10, 2016). In MUR 7072, which related to the reimbursement scheme at issue in the criminal case, in light of Babulal Bera’s sentencing in the criminal matter, his advanced age, and the fact that most of the activity was beyond the statute of limitations, the Commission dismissed the matter and admonished Babulal Bera. *See* Babulal Bera Factual and Legal Analysis, MUR 7072; Commission Certification, MUR 7072 (Babulal Bera, *et al.*) (Dec. 9, 2016). The available information, however, does not indicate that any of the contributions at issue in MURs 6990, 7079 or 7121 were part of the criminal activity at issue in MUR 7072.

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1 candidates.²⁰ The Complaint asserts that the Bera family unlawfully reimbursed the network's
2 contributions by making "substantially equivalent contributions" to the participating
3 congressional candidates.²¹

4 The Respondents deny the allegations for many of the same reasons asserted by the
5 Respondents in MUR 6990: the Complainant fails to present any facts demonstrating that they
6 were involved in an unlawful scheme involving the reimbursement of contributions, and the
7 Commission has previously determined that the donor activity as described in the Complaint is
8 permissible.²² Several of the Respondents also note that the five-year statute of limitations
9 ("SOL") has expired for some of the violations alleged in the Complaint.²³

10 **3. MUR 7121**

11 The Complaint in MUR 7121 alleges that candidate Michael Eggman knowingly
12 participated in a scheme with the Bera family and the Bera Committee to assist Babulal Bera in

²⁰ MUR 7079 Compl. at 2-3. The candidates are Suzan DelBene, Michael Eggman, Jon Hulburd, Stacey Lawson, Patrick Murphy, Scott Peters, Steve Pougnet, Dan Roberti, Dr. Raul Ruiz, Loretta Sanchez, Ravi Sangisetty, Kevin Strouse, Dina Titus, and Manan Trevidi.

²¹ MUR 7079 Compl. at 3-4. *See* Attachment 1. Specific examples of this alleged scheme provided in the Complaint involve contributions from candidate Ravi Sangisetty's parents, Aruna and Koti Sangisetty, in 2010; contributions from candidate Patrick Murphy's father, Thomas P. Murphy, Jr., in 2011; contributions from candidate Scott Peters, his wife and his mother-in-law in 2012; and, contributions from candidate Patrick Murphy's mother, Leslie Murphy, in 2013. *See* Compl. at 4-6; *supra* n.7.

²² *See* Loretta Sanchez, Committee to Re-elect Loretta Sanchez Resp. at 1-3; Sangisetty for Congress LLC Resp. at 1-2; Koti, Aruna and Ravi Sangisetty Resp. at 1-2; Michael Eggman, Eggman for Congress Resp. at 2; Ami and Janine Bera, Bera Committee Joint Resp. at 2.; Babulal and Kanta Bera Resp. at 2; Scott Peters, Scott Peters for Congress, Lynn Gorguze, Gloria Gorguze Joint Resp. at 1; Suzan DelBene, DelBene for Congress, Patrick Murphy, Murphy Committee, Thomas P. Murphy, Jr., Leslie Murphy, Raul Ruiz, Dr. Paul Ruiz for Congress, Kevin Strouse; Dina Titus, Titus for Congress, Dan Roberti, Dan Roberti for Congress Joint Resp. at 1-4.

²³ Sangisetty for Congress LLC Resp. at 2; Koti, Aruna and Ravi Sangisetty Resp. at 2. As of the date of this report, the activity from 2009, 2010 and 2011 was beyond the SOL, representing approximately 35% of the overall amount at issue in MUR 7079.

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1 evading the Act's individual contribution limits.²⁴ According to the Complaint, in June 2013,
2 Michael Eggman directed Eggman for Congress to make a \$1,000 contribution to the Bera
3 Committee and ten days later, Babulal Bera contributed \$1,000 to Eggman for Congress.²⁵
4 Based on the close timing of the two contributions and the fact that Eggman for Congress never
5 contributed to another candidate committee, the Complainant in MUR 7121 contends that the
6 Respondents entered into an agreement to have Eggman for Congress' contribution to the Bera
7 Committee reimbursed by Babulal Bera.²⁶ The Complaint further alleges that Eggman and
8 Eggman for Congress knowingly accepted an illegal reimbursed contribution, and consequently
9 filed inaccurate disclosure reports with the Commission.²⁷

10 The Respondents deny the allegations for many of the same reasons asserted by the
11 Respondents in MURs 6990 and 7079: the Complainant fails to present any facts demonstrating
12 that they were involved in an unlawful scheme involving the reimbursement of contributions and
13 the Commission has previously determined that the donor activity as described in the Complaint
14 is permissible.²⁸

²⁴ MUR 7121 Compl. at 2-4. Like the Complaint in MUR 7079, the MUR 7121 Complaint references Babulal Bera's conviction for reimbursing federal contributions and asserts that Eggman and his campaign committee, Eggman for Congress, "were integral" in that "illegal straw donor scheme." *Id.* at 1; *see supra* n.19.

²⁵ *Id.* at 2-3. *See* Attachment 1.

²⁶ MUR 7121 Compl. at 1-4.

²⁷ *Id.* at 3-4.

²⁸ *See* Michael Eggman and Eggman for Congress Joint Resp. at 2, 4-5, Attachment A (M. Eggman Declaration, Oct. 4, 2016); Babulal Bera Resp. at 1-2; Ami Bera and Bera Committee Joint Resp. at 2-3.

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1 **B. Legal Analysis**

2 The Act limits how much an individual can contribute to a federal candidate and his or
3 her principal campaign committee.²⁹ The Act and Commission regulations provide that no
4 person shall make a contribution in the name of another person or knowingly permit his or her
5 name to be used to effect such a contribution.³⁰ In addition, "no person shall . . . knowingly help
6 or assist any person in making a contribution in the name of another."³¹ Candidates, their
7 committees, and their agents are also prohibited from knowingly accepting contributions that
8 exceed the Act's limits and contributions made in the name of another.³² Finally, candidate
9 committees are required to file reports of receipts and disbursements in accordance with the Act
10 and Commission regulations.³³

11 As argued in the Responses, the available information does not support the
12 Complainants' allegations that the contributions identified in the Complaints constitute
13 contributions in the name of another. The Complaint in MUR 6990 identifies contributions
14 made by four parents to each other's adult children, but does not provide any information –

²⁹ 52 U.S.C. § 30116(a). During the 2010, 2012, 2014 and 2016 election cycles, an individual could contribute a maximum of \$2,400, \$2,500, \$2,600 and \$2,700, respectively, to a candidate per election. The Act permits an authorized committee to contribute up to \$2,000 to the authorized committee of another candidate. 52 U.S.C. § 30102(e)(3)(B).

³⁰ 52 U.S.C. § 30122; 11 C.F.R. § 110.4(b)(1)(i), (ii).

³¹ See 11 C.F.R. § 110.4(b)(1)(iii).

³² See 52 U.S.C. §§ 30116(f) and 30122; 11 C.F.R. §§ 110.4(b)(1)(iv). Commission regulations also require treasurers of political committees to examine all contributions for evidence of illegality. Should a treasurer determine that a contribution is illegal, including that a contribution was made in the name of another, the treasurer shall refund the contribution to the contributor within 30 days of the date on which the illegality was discovered. 11 C.F.R. § 103.3(b).

³³ See 52 U.S.C. § 30104(a)(2); 11 C.F.R. § 104.14(d) (each treasurer of a political committee shall be responsible for the timely, complete and accurate filing of disclosure reports.)

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1 indeed, does not even specifically allege – that the funds were not the personal funds of the
2 named contributors. The Complaint in MUR 7079, which asserts that fourteen congressional
3 candidates, their families, and campaign committees participated with the Beras in the alleged
4 scheme, specifically describes a series of contributions made by four of those candidates and
5 their relatives, including parents, spouses, siblings, and an in-law, but does not provide any
6 information that these contributions were not made with the personal funds of the named
7 contributors. Similarly, the Complaint in MUR 7121 presents no information that Eggman for
8 Congress did not use its own funds to contribute to the Bera Committee or that Babulal Bera's
9 contribution to Eggman for Congress was not made with his personal funds.³⁴

10 Moreover, the Commission has previously determined that trading contributions in the
11 manner described in these three complaints does not violate the Act so long as contributors used
12 their own funds to make their contributions. *See* MUR 4783 (Brian Babin for Congress, *et al.*)
13 (Commission found that contributions made by Peter Cloeren, a "maxed-out" supporter of
14 candidate Brian Babin, to the Re-elect Thurmond Committee and the Gill Committee campaigns
15 based on an express understanding that donors to those other committees would in turn
16 contribute to Babin's campaign did not violate the Act because Cloeren did not actually

³⁴ Accordingly, the available information does not indicate any reporting violations on the part of Eggman for Congress or its treasurer in his official and individual capacity.

1 reimburse the other donors' contributions).³⁵

2 Accordingly, we recommend that the Commission find no reason to believe that the
3 Respondents named in MURs 6990, 7079 and 7121 violated 52 U.S.C §§ 30102(e)(3)(B), 30104,
4 30116(a), 30116(f), or 30122 or 11 C.F.R. § 110.4(b). We further recommend that the
5 Commission close the files.

6 **III. RECOMMENDATIONS**

- 7 1. Find no reason to believe that Thomas P. Murphy, Jr. violated 52 U.S.C.
8 §§ 30116(a) or 30122 or 11 C.F.R. § 110.4(b);
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10 2. Find no reason to believe that Leslie Murphy violated 52 U.S.C. §§ 30116(a) or
11 30122 or 11 C.F.R. § 110.4(b);
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13 3. Find no reason to believe that Patrick Murphy violated 52 U.S.C. §§ 30116(a) or
14 30122 or 11 C.F.R. § 110.4(b);
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16 4. Find no reason to believe that Friends of Patrick Murphy and Brian Foucart in his
17 official capacity as treasurer violated 52 U.S.C. §§ 30116(f) or 30122 or
18 11 C.F.R. § 110.4(b);
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20 5. Find no reason to believe that Robert Strouse violated 52 U.S.C §§ 30116(a) or
21 30122 or 11 C.F.R. § 110.4(b);
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23 6. Find no reason to believe that Kevin Strouse violated 52 U.S.C §§ 30116(a) or
24 30122 or 11 C.F.R. § 110.4(b);
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26 7. Find no reason to believe that Kevin Strouse for Congress and Robert Fader in his
27 official capacity as treasurer violated 52 U.S.C. §§ 30116(f) or 30122 or
28 11 C.F.R. § 110.4(b);
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³⁵ First Gen. Counsel's Rpt. at 29-31, MUR 4783 (Brian Babin, *et al.*); Commission Certification, MUR 4783 (Brian Babin, *et al.*) (July 22, 1999). See also Advisory Op. 1996-33 (Colantuono). In that opinion, the Commission determined that a state legislator's proposal to contribute surplus state funds to several other state legislative candidate committees and then solicit these same committees for roughly equivalent contributions to his federal committee was impermissible because the arrangement would result in the requester replenishing, in advance or afterward, the contributions to his federal committee. However, the Commission opined that it would be permissible, subject to certain conditions, for the requestor to contribute to other state legislative committees and then solicit these state legislators for contributions from personal funds as that scenario would not involve reimbursing contributions.

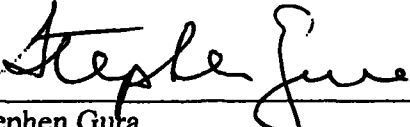
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- 1 8. Find no reason to believe that Babulal Bera violated 52 U.S.C §§ 30116(a) or
2 30122 or 11 C.F.R. § 110.4(b);
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- 4 9. Find no reason to believe that Kanta Bera violated 52 U.S.C §§ 30116(a) or 30122
5 or 11 C.F.R. § 110.4(b);
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- 7 10. Find no reason to believe that Amerish "Ami" Bera violated 52 U.S.C
8 §§ 30116(a) or 30122 or 11 C.F.R. § 110.4(b);
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- 10 11. Find no reason to believe that Janine Bera violated 52 U.S.C §§ 30116(a) or
11 30122 or 11 C.F.R. § 110.4(b);
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- 13 12. Find no reason to believe that Ami Bera for Congress and Jennifer May in her
14 official capacity as treasurer violated 52 U.S.C. §§ 30116(f) or 30122 or
15 11 C.F.R. § 110.4(b);
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- 17 13. Find no reason to believe that Suzan DelBene violated 52 U.S.C. §§ 30116(a) or
18 30122 or 11 C.F.R. § 110.4(b);
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- 20 14. Find no reason to believe that DelBene for Congress and Jay Patterson in his
21 official capacity as treasurer violated 52 U.S.C. §§ 30116(f) or 30122 or
22 11 C.F.R. § 110.4(b);
23
- 24 15. Find no reason to believe that Michael Eggman violated 52 U.S.C. § 30122 or
25 11 C.F.R. § 110.4(b);
26
- 27 16. Find no reason to believe that Eggman for Congress and Jay Petterson in his
28 official and individual capacity as treasurer violated 52 U.S.C. §§ 30102(e)(3)(B),
29 30104, 30116(f), or 30122 or 11 C.F.R. § 110.4(b);
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- 31 17. Find no reason to believe that Stacey Lawson violated 52 U.S.C. §§ 30116(a) or
32 30122 or 11 C.F.R. § 110.4(b);
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- 34 18. Find no reason to believe that Stacey Lawson for Congress and Kevin Heneghan
35 in his official capacity as treasurer violated 52 U.S.C. §§ 30116(f) or 30122 or
36 11 C.F.R. § 110.4(b);
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- 38 19. Find no reason to believe that Jon Hulburd violated 52 U.S.C. §§ 30116(a) or
39 30122 or 11 C.F.R. § 110.4(b);
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- 41 20. Find no reason to believe that Hulburd for Congress and David Beckham in his
42 official capacity as treasurer violated 52 U.S.C. §§ 30116(f) or 30122 or
43 11 C.F.R. § 110.4(b);

- 1 34. Find no reason to believe that the Committee to Re-elect Loretta Sanchez and
2 Katharine Meyer Borst in her official capacity as treasurer violated 52 U.S.C.
3 §§ 30116(f) or 30122 or 11 C.F.R. § 110.4(b);
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5 35. Find no reason to believe that Ravi Sangisetty violated 52 U.S.C. §§ 30116(a) or
6 30122 or 11 C.F.R. § 110.4(b);
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8 36. Find no reason to believe that Koti Sangisetty violated 52 U.S.C. §§ 30116(a) or
9 30122 or 11 C.F.R. § 110.4(b);
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11 37. Find no reason to believe that Aruna Sangisetty violated 52 U.S.C. §§ 30116(a) or
12 30122 or 11 C.F.R. § 110.4(b);
13
14 38. Find no reason to believe that Sangisetty for Congress LLC and Kurt Fakier in his
15 official capacity as treasurer violated 52 U.S.C. §§ 30116(f) or 30122 or
16 11 C.F.R. § 110.4(b);
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18 39. Find no reason to believe that Stephen P. Pougnet violated 52 U.S.C. §§ 30116(a)
19 or 30122 or 11 C.F.R. § 110.4(b);
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21 40. Find no reason to believe that Friends of Steve Pougnet and Kinde Durkee in her
22 official capacity as treasurer violated 52 U.S.C. §§ 30116(f) or 30122 or
23 11 C.F.R. § 110.4(b);
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25 41. Approve the attached Factual and Legal Analyses;
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27 42. Approve the appropriate letters; and
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29 43. Close the files.

30 Lisa J. Stevenson
31 Acting General Counsel

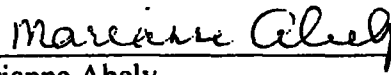
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33 Acting Associate General Counsel

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Deputy Associate General Counsel for Enforcement

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Mark Allen
Assistant General Counsel



Marianne Abely
Attorney

Attachments:

1. Table of Contributions

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Contribution Table – MURs 6990, 7079 & 7121

2009 Contributions			
Date	Contributor	Recipient Committee	Amount
12/31/2009	Stephen P. Pougnet	Ami Bera for Congress	\$2,400 (Primary) \$2,400 (General)
12/31/2009	Janine Bera	Friends of Steve Pougnet	\$2,400 (P) \$2,400 (G)

2010 Contributions			
Date	Contributor	Recipient Committee	Amount
3/29/2010	Aruna Sangisetty	Ami Bera for Congress	\$2,400 (P) \$2,400 (G)
3/29/2010	Koti Sangisetty	Ami Bera for Congress	\$2,400 (P) \$2,400 (G)
3/29/2010	Babulal Bera ¹	Sangisetty for Congress	\$2,400 (P) \$2,400 (G)
3/29/2010	Kanta Bera	Sangisetty for Congress	\$2,400 (P) \$2,400 (G)
6/6/2010	Carrie Hulburd	Ami Bera for Congress	\$2,400 (P) \$2,400 (G)
6/6/2010	Jules Hulburd	Ami Bera for Congress	\$2,400 (P) \$2,400 (G)
6/7/2010	Clif Hulburd	Ami Bera for Congress	\$2,400 (P) \$2,400 (G)
6/7/2010	Babulal Bera	Hulburd for Congress	\$2,400 (P) \$2,400 (G)
6/7/2010	Kanta Bera	Hulburd for Congress	\$2,400 (P) \$2,400 (G)
6/7/2010	Janine Bera	Hulbrand for Congress	\$2,400 (P) \$2,400 (G)
6/29/2010	Amerish "Ami" Bera	Trivedi for Congress	\$2,400 (P) \$2,400 (G)
6/29/2010	Janine Bera	Trivedi for Congress	\$2,400 (P) \$2,400 (G)
6/30/2010	Maulik Trivedi	Ami Bera for Congress	\$2,300 (G)

¹ Amerish "Ami" Bera also made two \$2,400 contributions to Sangisetty for Congress on March 30, 2010.

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2011 Contributions			
Date	Contributor	Recipient Committee	Amount
6/28/2011	Vincent Roberti	Ami Bera for Congress	\$2,500 (P) \$2,500 (G)
6/30/2011	Vincent Roberti, Jr.	Ami Bera for Congress	\$2,500 (P) \$2,500 (G)
6/30/2011	Janine Bera	Dan Roberti for Congress	\$2,500 (P) \$2,500 (G)
6/30/2011	Babulal Bera ²	Dan Roberti for Congress	\$2,500 (P) \$2,500 (G)
9/26/2011	Janine Bera	Friends of Patrick Murphy	\$2,300 (P) \$2,300 (G)
9/29/2011	Patrick Murphy	Ami Bera for Congress	\$2,300 (P) \$2,300 (G)

2012 Contributions			
Date	Contributor	Recipient Committee	Amount
2/20/2012	Amerish "Ami" Bera	DelBene for Congress	\$2,500 (P)
2/28/2012			\$2,500 (G)
2/28/2012	Janine Bera	DelBene for Congress	\$2,500 (P) \$2,500 (G)
3/8/2012	Suzan DelBene	Ami Bera for Congress	\$2,500 (P) \$2,500 (G)
3/18/2012	Kurt DelBene	Ami Bera for Congress	\$2,500 (P) \$2,500 (G)
3/17/2012	Stacey Lawson	Ami Bera for Congress	\$2,500 (P) \$2,500 (G)
3/17/2012	Janine Bera ³	Stacey Lawson for Congress	\$2,500 (P) \$2,500 (G)
6/20/2012	Amerish "Ami" Bera	Scott Peters for Congress	\$2,500 (P) \$2,500 (G)
6/25/2012	Lynn Gorguze	Ami Bera for Congress	\$2,500 (G)

² Babulal Bera's wife, Kanta Bera, also made two \$2,500 contributions to the Dan Roberti for Congress committee on June 30, 2011.

³ Amerish "Ami" Bera's father, Babulal Bera, contributed a total of \$5,000 to Stacey Lawson for Congress on March 29, 2012.

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6/25/2012	Scott Peters	Ami Bera for Congress	\$2,500 (P) \$2,500 (G)
2013 Contributions			
Date	Contributor	Recipient Committee	Amount
3/5/2013	Leslie Murphy	Ami Bera for Congress	\$2,600 (P) \$2,600 (G)
3/19/2013	Babulal Bera	Friends of Patrick Murphy	\$2,600 (P) \$2,600 (G)
3/19/2013	Kanta Bera	Friends of Patrick Murphy	\$2,600 (P) \$2,600 (G)
6/22/2013	Robert Strouse	Friends of Patrick Murphy	\$2,600 (P) \$2,600 (G)
6/26/2013	Thomas P. Murphy, Jr.	Kevin Strouse for Congress	\$2,600 (P) \$2,600 (G)
6/20/2013	Eggman for Congress	Ami Bera for Congress	\$1,000 (P)
6/30/2013	Babulal Bera	Eggman for Congress	\$1,000 (P)
6/28/2013	Norma Strouse	Ami Bera for Congress	\$2,600 (P) \$2,600 (G)
6/28/2013	Robert Strouse	Ami Bera for Congress	\$2,600 (P) \$2,600 (G)
6/30/2013	Babulal Bera	Kevin Strouse for Congress	\$2,600 (P) \$2,600 (G)
6/30/2013	Kanta Bera	Kevin Strouse for Congress	\$2,600 (P) \$2,600 (G)
6/30/2013	Gloria Gorguze	Ami Bera for Congress	\$2,600 (P) \$2,600 (G)
6/30/2013	Vincent Gorguze	Ami Bera for Congress	\$2,600 (P) \$2,600 (G)
6/30/2013	Babulal Bera	Scott Peters for Congress	\$2,600 (P) \$2,600 (G)
6/30/2013	Kanta Bera	Scott Peters for Congress	\$2,600 (P) \$2,600 (G)

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2014 Contributions			
Date	Contributor	Recipient Committee	Amount
6/30/2014	Rajesh Bera	Dr. Raul Ruiz for Congress	\$1,000 (P)
6/30/2014	Rimal Bera	Dr. Raul Ruiz for Congress	\$2,500 (P)
10/28/2014	Dr. Raul Ruiz for Congress	Ami Bera for Congress	\$2,000 (G)

2015 Contributions			
Date	Contributor	Recipient Committee	Amount
3/31/2015	Babulal Bera	Scott Peters for Congress	\$2,700 (P) \$2,700 (G)
3/31/2015	Kanta Bera	Scott Peters for Congress	\$2,700 (P) \$2,700 (G)
4/9/2015	Lynn Gorguze	Ami Bera for Congress	\$2,700 (P) \$2,700 (G)
4/9/2015	Gloria Gorguze	Ami Bera for Congress	\$2,700 (P) \$2,700 (G)

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