

FEDERAL ELECTION COMMISSION
 GREELEY THOMPSON
 2019 DEC 13 AM 9:27
 CELA

2550 Fifth Avenue, Suite 515
 San Diego, CA 92103

James R. Thompson, Esq.
 619.766.5841 office
 619.600.0065 direct
 619.350.3261 facsimile
 jthompson@greeleythompson.com

October 30, 2019

San Diego Ethics Commission
 450 B Street, Suite 780
 San Diego, CA 92101

Summer Stephan, District Attorney
 Hall of Justice
 330 W. Broadway
 San Diego, CA 92101

Fair Political Practices Commission
 1102 Q Street, Suite 3000
 Sacramento, CA 95811

Federal Election Commission
 1050 First Street, NE
 Washington, DC 20463

United States Attorney's Office, Southern
 District of California
 Federal Office Building
 880 Front Street, Room 6293
 San Diego, CA 92101

MUR # 7673

OFFICE OF
 GENERAL COUNSEL
 2019 DEC 17 PM 1:00

To Whom It May Concern:

This is a complaint and a request for an investigation of potential violations of campaign contribution laws in connection with a campaign for the San Diego City Council in District 7.

Potential responsible party: Raul Campillo for City Council District 7 2020.

Potential Violations: Potential Violation of Rules Regarding Campaign Contributions.

Potential Code Sections Violated: California Government Code, section 85320; 52 U.S.C. section 30121.

Explanation of Potential Violations:

Potential unlawful contributions by a foreign national:

Raul Campillo for City Council District 7 2020 lists two contributions from Joel Delgado. He is listed as an "empleado" at Denny's. His address is listed as 404 E 2 Street, Calixeco, California 92231. (See Exhibit A). 404 E 2 Street, Calixeco, California is not a residence address for Joel Delgado. Instead, it is a business address for Barron's Enterprises, a company providing immigration, tax and postal services. (See Exhibit B). Joel Delgado's Facebook account lists his current home as Mexicali, Baja California. (See Exhibit C).

California Government Code section 85320 prohibits campaign contributions from foreign principals. A foreign principal includes a person outside of the United States. 52 U.S.C. section 30121 states it is unlawful for a foreign national to make a campaign contribution to a local

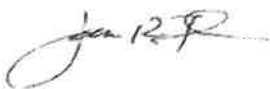
political campaign, and it is unlawful for a person to solicit, accept, or receive a contribution or donation from a foreign national. 52 U.S.C. section 30121 states that a foreign national is an individual who is not a citizen of the United States and who is not lawfully admitted for permanent residence. Under 8 U.S.C. section 1101, the term "lawfully admitted for permanent residence" means the status of having been lawfully accorded the privilege of residing permanently in the United States as an immigrant in accordance with the immigration laws, such status not having changed.

Mr. Delgado does not appear to be a registered voter in Imperial County. He does not appear to be a U.S. citizen. He does not appear to have green card status allowing him to live permanently in the United States. Mr. Delgado appears to live outside the United States in Mexicali, Baja California. As a result, Mr. Delgado appears to be a foreign principal and foreign national. If he is, then it would be unlawful for Mr. Delgado to make campaign contributions to Raul Campillo for City Council District 7 2020 and it would also be unlawful for Raul Campillo for City Council District 7 2020 to accept campaign contributions from Mr. Delgado.

Potential improper reimbursement by an employer for a contribution:

Joel Delgado, and "empleado" at Denny's in Calixeco, has made two contributions. Mr. Delgado's address is listed as 404 E 2 Street, Calixeco, California 92231. (See Exhibit A). The Denny's in Calixeco, California is owned by Alejandro Campillo, the father of candidate Raul Campillo. (See Exhibit D). The contributions made by Denny's employee Joel Delgado raise a question of whether there was any improper reimbursement by Denny's (or Raul Campillo) to Mr. Delgado for his campaign contributions.

Best regards,



James R. Thompson
Greeley Thompson LLP

EXHIBIT A

Schedule A (Continuation Sheet)
Monetary Contributions Received

Amounts may be rounded
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period		CALIFORNIA FORM 460
from	01/01/2019	
through	06/30/2019	Page <u>51</u> of <u>95</u>
NAME OF FILER		I.D. NUMBER
Raul Campillo for City Council District 7 2020		1415303

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31)	PER ELECTION TO DATE (IF REQUIRED)
05/27/2019	Maria Palmer [REDACTED] Albuquerque, NM 87105	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Consultant MPG Consulting	100.00	100.00	P2020 \$100.00
05/27/2019	John Waugh [REDACTED] San Diego, CA 92120	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Consultant Workday	50.00	100.00	P2020 \$100.00
05/28/2019	Vincent Giannone [REDACTED] Baltimore, MD 21202	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Campaign Staff Kamala for the People	25.00	175.00	P2020 \$175.00
05/29/2019	Sonia Robles [REDACTED] Calexico, CA 92231	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Comptroller Dennys	50.00	100.00	P2020 \$100.00
05/30/2019	Joel Delgado 404 E 2 Street Calexico, CA 92231	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Empleado Dennys	100.00	200.00	P2020 \$200.00
SUBTOTAL \$				325.00		

*Contributor Codes
 IND - Individual
 COM - Recipient Committee
 (other than PTY or SCC)
 OTH - Other (e.g., business entity)
 PTY - Political Party
 SCC - Small Contributor Committee

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Schedule A (Continuation Sheet)
Monetary Contributions Received

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from	01/01/2019	
through	06/30/2019	Page 78 of 95

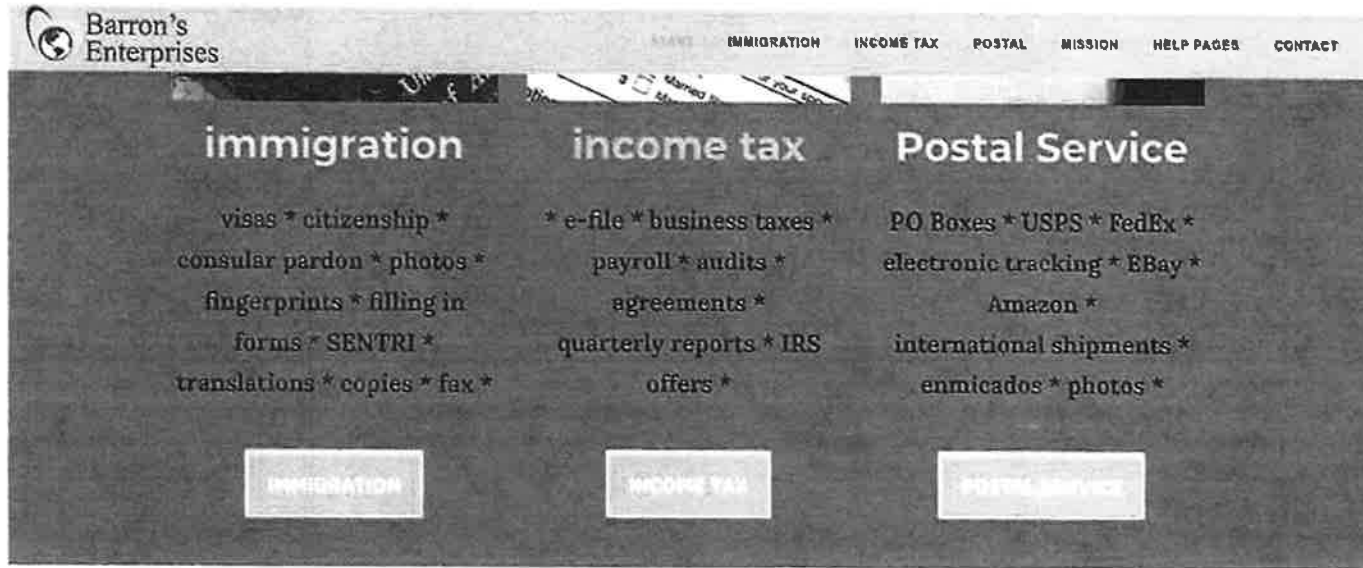
NAME OF FILER Raul Campillo for City Council District 7 2020	I.D NUMBER 1415303
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DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC 31)	PER ELECTION TO DATE (IF REQUIRED)
06/30/2019	TrAnthony Davis Los Angeles, CA 90043	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Head of School Vox Collegiate of Los Angeles	50.00	300.00	P2020 \$300.00
06/30/2019	Joel Delgado 404 E 2 Street Calexico, CA 92231	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Empleado Dennys	100.00	200.00	P2020 \$200.00
06/30/2019	Mark Easton Rolling Hills, CA 90274	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Attorney O'Melveny & Myers LLP	550.00	1,150.00	P2020 \$600.00 G2020 \$550.00
06/30/2019	Mark Easton Rolling Hills, CA 90274	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Attorney O'Melveny & Myers LLP	50.00	1,150.00	P2020 \$600.00 G2020 \$550.00
06/30/2019	Laura Farlood San Diego, CA 92130	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	None None	25.00	350.00	P2020 \$350.00
SUBTOTAL \$				775.00		

*Contributor Codes
 IND - Individual
 COM - Recipient Committee
 (other than PTY or SCC)
 OTH - Other (e.g., business entity)
 PTY - Political Party
 SCC - Small Contributor Committee

EXHIBIT B

<https://www.barronsusa.com>



404 E 2nd Street, Calexico CA 92231

EXHIBIT C



Joel Delgado

[Add Friend](#) [Message](#) ...

[Timeline](#) [About](#) [Friends](#) [Photos](#) [More ▾](#)

About

To see what he shares with friends, [send him a friend request.](#)

[Add Friend](#)

Overview

Work and Education

Places He's Lived

CURRENT CITY AND HOMETOWN



Mexicali, Baja California

Current city

EXHIBIT D

Alejandro O. Campillo

A Professional Law Corporation

Call Toll-Free: (866) 240-2809
Local: (619) 234-6994
Free Telephonic Consultation

- Home
- Attorneys
- Immigration Matters
- Verdicts and Settlements
- F.A.Q.'s
- Videos
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San Diego Immigration Attorney

Alejandro O. Campillo

Professional Experience:

- * Alejandro O. Campillo, A Professional Law Corporation 1981 to present
- * Certified Specialist, Immigration & Nationality Law, Board of Legal Specialization, State Bar of California 1992 to present.



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* Name: _____
 Mailing Address _____
 City, State & Zip _____
 * Phone - eg (xxx) xxx-xxx _____
 * Email _____

Real Estate Development:

- Director and principal in various commercial and industrial real estate development projects in Mexicali, Mexico and Calexico, California, 1985 - Present
- Director, developer and owner of a new construction Denny's Restaurant franchise in Calexico, California; presently the largest Denny's in the United States; 1992 - Present

CALIFORNIA JURAT WITH AFFIANT STATEMENT

GOVERNMENT CODE § 8202

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

Signature of Document Signer No. 1 *Signature of Document Signer No. 2 (if any)*

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
 County of San Diego

Subscribed and sworn to (or affirmed) before me
 on this 21st day of November, 2019,
 by *Date* *Month* *Year*



(1) James R. Thompson
 (and (2) _____),
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence
 to be the person(s) who appeared before me.

Signature _____
Signature of Notary Public

Seal
 Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____ Document Date: _____

Number of Pages: _____ Signer(s) Other Than Named Above: _____