### BELL, McANDREWS & HILTACHK, LLP

Attorneys and Counselors at Law

455 CAPITOL MALL, SUITE 600 SACRAMENTO, CA 95814

> (916) 442-7757 FAX (916) 442-7759

November 10, 2020

VIA EMAIL cela@fec.gov Federal Election Commission Office of Complaints Examination & Legal Administration ATTN: Kathryn Ross, Paralegal 1050 First Street, NE Washington, DC 20463

RE: MUR 7837

Response of Respondents: David Valadao, Candidate CA-21 Valadao for Congress and Melissa Allen, Treasurer (C00499392) Vitoria PAC and Melissa Allen, Treasurer (C00712695)

This law firm represents the respondents in this matter. The complaint alleges that leadership PAC funds are being used to subsidize campaign expenses for the candidate's principal campaign committee. The complaint particularly alleges that Andrew Renteria's compensation in July, August, and September 2020 paid partially from Vitoria PAC ("Vitoria") should be reported as an in-kind contribution to Valadao for Congress ("VFC"), and that the in-kind amount exceeds the applicable contribution limit. These allegations lack merit as Andrew Renteria works for both committees and was appropriately compensated by each committee in proportion to the services provided.

As you know, a leadership PAC is a committee, established and controlled by the candidate, that is not an authorized committee and is not affiliated with the candidate's principal campaign committee. (52 U.S.C. 30104(i)(8)(B).) In adopting Regulation 100.5(g)(5), the FEC clarified "the relationship between an authorized committee and a leadership PAC by removing the possibility that a candidate's authorized committee can be affiliated with an entity that is not an authorized committee, even if the candidate established, financed, maintained, or controlled that entity." (*Id.* at 67016.) Accordingly, the Commission decided to adopt an "in-kind contribution analysis as a rule of general applicability as they pertain to leadership PACs," meaning that a leadership PAC is not allowed to provide support to the Federal candidate or officeholder with whom it is associated in amounts different than those available to other similar political committees. (*Id.*) To the extent that leadership PACs are used to pay for costs that could and should otherwise be paid for by a candidate's authorized committee, such payments are in-kind contributions, subject to the Act's

RE: MUR 7837, Response of Respondents November 10, 2020 Page 2

contribution limits and reporting requirements." (See Federal Register, December 1, 2003, Vol. 68, No. 230, page 67016.) This goes both ways, "Any financial support to the leadership PAC from a candidate's authorized committee is a contribution to the leadership PAC." (FEC Nonconnected PAC manual, page 1.)

Accordingly, any staff working for both VFC and Vitoria are compensated according to the amount of time spent working on behalf of each committee. In July, fundraising efforts for VFC reduced significantly as donors reached the allowable limit, while fundraising efforts for Vitoria increased significantly, therefore requiring an adjustment of the portion of Mr. Renteria's compensation paid by each committee.

The payments by Vitoria to Andrew Renteria is not in violation of any law or regulation, including the contribution limit that applies to a leadership PAC giving to an authorized committee. A committee may use contributions received "for ordinary and necessary expenses incurred" when operating a committee. (52 U.S.C. 30114(a)(2).) Fundraising consulting is an ordinary and necessary expense to any committee. Here, Andrew Renteria was engaged in fundraising efforts for Vitoria. Normally his compensation is labeled as "campaign manager services" when working for VFC, but when he did work for Vitoria, his services are better described as "fundraising consulting." Out of an abundance of caution and to clarify the nature of services provided by Andrew Renteria to Vitoria, this description has been amended (amended reports attached hereto).

Thank you for the opportunity to respond to this complaint. As should now be apparent, the compensation paid to Andrew Renteria was allocated appropriately between the two committees based on the relative amount of time devoted to each committee's activities. If you require any additional information from to make your determination, please direct such correspondence to my attention on behalf of the respondents.

Respectfully submitted,

Ashlee Titus

Attorney for respondents

### A=G79@@5B9CIGH9LH fl 97:cfa -- Ł

PAGE 1 / 1

Vitoria PAC C00712695

5132 North Palm Avenue #227

Fresno

CA 93704

Vitoria PAC is filing two amended reports. The October quarterly as well as the Pre-General report. These are being amended to correct the description of the expenses to Andrew Renteria. These should have the description "Fundraising consulting", as this more accurately describes the work that Mr. Renteria was doing for the committee at the time.

### FEC FORM 3X

# REPORT OF RECEIPTS AND DISBURSEMENTS

FORM 3X	For O	ther Than An Auth	norized Commit	tee	Office	Use Only
NAME OF COMMITTEE (in formal committee)		OR PRINT ▼	Example: If typover the lines.	oing, type	12FE4M5	
Vitoria PAC	9 9 9 9 9			F F F F F		11111111
frennan	4 4 4 4 4					111111
ADDRESS (number and		2 North Palm Avenue				
Check if differ than previous reported. (AC	rent #22				CA 937	04
2. FEC IDENTIFICA	TION NUMBER	₹ CIT	YA	(	STATE A	ZIP CODE ▲
C C00712695			THIS EPORT	NEW (N) OR	AMENDE (A)	D
July 15 Quarterly October 1 Quarterly January 3 Year-End July 31 M	Report (Q1)  Report (Q2)  5 Report (Q3)  11 Report (YE)  Iid-Year on-election  i) (MY)	Report Due On: Mar	General (3	(12C)	Aug 20 (M8 Sep 20 (M9 Oct 20 (M10 General (12G) Special (12S)  Runoff (30R)	(Non-Election Year Only)  Dec 20 (M12) (Non-Election Year Only)
5. Covering Period	07 ·	01 Y Y Y Y Y Y 2020	through	M = M 09	30 2	2020
I certify that I have exa Type or Print Name of	Alle	ort and to the best of n, Melissa, , ,	my knowledge and	I belief it is tru	e, correct and comp	lete.
Signature of Treasurer	Allen, Melissa	<b>1</b> , , ,		D		09 / 2020
ST	lse, erroneous, o	r incomplete information	may subject the pe	erson signing th		ulties of 52 U.S.C. § 30109
Office Use Only					FE	C FORM 3X Rev. 05/2016

### SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016) Page 2 Write or Type Committee Name Vitoria PAC 2020 30 2020 Report Covering the Period: From: To: COLUMN A COLUMN B This Period Calendar Year-to-Date (a) Cash on Hand 59990.59 January 1, 2020 (b) Cash on Hand at 112302.39 Beginning of Reporting Period..... 46598.73 130381.98 (c) Total Receipts (from Line 19) ..... (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 190372.57 158901.12 6(a) and 6(c) for Column B) ..... 85654.21 117125.66 Total Disbursements (from Line 31)..... 8. Cash on Hand at Close of Reporting Period 73246.91 73246.91 (subtract Line 7 from Line 6(d))..... Debts and Obligations Owed TO the Committee (Itemize all on 0.00 Schedule C and/or Schedule D) ..... 10. Debts and Obligations Owed BY the Committee (Itemize all on 0.00 Schedule C and/or Schedule D) ..... This committee has qualified as a multicandidate committee. (see FEC FORM 1M) For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-694-1100

of Receipts

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name Vitoria PAC 01 07 2020 09 30 2020 Report Covering the Period: From: To: **COLUMN A** COLUMN B I. Receipts Total This Period Calendar Year-to-Date 11. Contributions (other than loans) From: (a) Individuals/Persons Other Than Political Committees 7500.00 47500.00 (i) Itemized (use Schedule A)..... 0.00 0.00 (ii) Unitemized ..... (iii) TOTAL (add 47500.00 7500.00 Lines 11(a)(i) and (ii)...... 0.00 0.00 (b) Political Party Committees ..... (c) Other Political Committees 0.00 0.00 (such as PACs)..... (d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry 47500.00 7500.00 Totals to Line 33, page 5) ...... 12. Transfers From Affiliated/Other 39098.73 82881.98 Party Committees..... 0.00 0.00 13. All Loans Received ..... 0.00 0.00 14. Loan Repayments Received...... 15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) 0.00 0.00 (Carry Totals to Line 37, page 5)..... 16. Refunds of Contributions Made to Federal Candidates and Other 0.00 0.00 Political Committees..... 17. Other Federal Receipts 0.00 (Dividends, Interest, etc.)..... 0.00 18. Transfers from Non-Federal and Levin Funds (a) Non-Federal Account 0.00 0.00 (from Schedule H3) ..... 0.00 0.00 (b) Levin Funds (from Schedule H5) ....... (c) Total Transfers (add 18(a) and 18(b)).. 0.00 0.00 19. Total Receipts (add Lines 11(d), 130381.98 12, 13, 14, 15, 16, 17, and 18(c))....... 46598.73 20. Total Federal Receipts 46598.73 (subtract Line 18(c) from Line 19) .......▶ 130381.98

FEC Form 3X (Rev. 05/2016)

of Disbursements

Page 4 COLUMN A COLUMN B II. Disbursements Total This Period Calendar Year-to-Date 21. Operating Expenditures: (a) Allocated Federal/Non-Federal Activity (from Schedule H4) 0.00 0.00 Federal Share ..... 0.00 0.00 (ii) Non-Federal Share..... (b) Other Federal Operating 43798.21 55069.66 Expenditures ..... (c) Total Operating Expenditures 55069.66 43798.21 22. Transfers to Affiliated/Other Party Committees..... 16.00 16.00 Contributions to Federal Candidates/Committees 62000.00 41800.00 and Other Political Committees..... 24. Independent Expenditures (use Schedule E) ..... 0.00 0.00 Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F)...... 0.00 0.00 26. Loan Repayments Made..... 0.00 0.00 Loans Made.....Refunds of Contributions To: 0.00 0.00 Individuals/Persons Other Than Political Committees ..... 0.00 0.00 (b) Political Party Committees ..... 0.00 0.00 (c) Other Political Committees (such as PACs)..... 0.00 0.00 Total Contribution Refunds (add Lines 28(a), (b), and (c))...... 0.00 0.00 29. Other Disbursements (Including Non-Federal Donations)..... 40.00 40.00 30. Federal Election Activity (52 U.S.C. § 30101(20)) (a) Allocated Federal Election Activity (from Schedule H6) (i) Federal Share ..... 0.00 0.00 (ii) "Levin" Share..... 0.00 0.00 (b) Federal Election Activity Paid Entirely With Federal Funds ..... 0.00 0.00 Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) ..... 0.00 0.00 31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)).. 85654.21 117125.66 32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)..... 85654.21 117125.66

of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5 III. Net Contributions/ COLUMN A COLUMN B Total This Period Calendar Year-to-Date Operating Expenditures 33. Total Contributions (other than loans) 7500.00 47500.00 (from Line 11(d), page 3) ..... 34. Total Contribution Refunds 0.00 0.00 (from Line 28(d))..... 35. Net Contributions (other than loans) 7500.00 47500.00 (subtract Line 34 from Line 33) ..... 36. Total Federal Operating Expenditures 43798.21 55069.66 (add Line 21(a)(i) and Line 21(b)) .......▶ 37. Offsets to Operating Expenditures 0.00 0.00 (from Line 15, page 3)..... 38. Net Operating Expenditures 43798.21 55069.66 

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		Use separate schedule(s)	FOR LINE NUMBER: PAGE 6 OF 24 (check only one)			
		for each category of the Detailed Summary Page	X   11a			
			person for the purpose of soliciting contributions are to solicit contributions from such committee.			
NAME OF COMMITTEE (In Full) Vitoria PAC						
Full Name of Individual (Last, First, Middle Resnick, Stewart, , ,	e Initial) or Full C	rganization Name	Date of Receipt			
Mailing Address 11444 W Olympic Blvd			09 25 2020			
City Los Angeles	State CA	Zip Code 90064	Transaction ID : A-1201000  Amount of Each Receipt this Period			
FEC ID number of contributing federal political committee.	C		2500.00			
Name of Employer (for Individual) Roll Global	***************************************	upation (for Individual) sident	Memo Item			
Receipt For:  Primary General  Other (specify) ▼	Aggregate	Year-to-Date ▼ 2500.00	1			
Full Name of Individual (Last, First, Middle Spencer, Michael, R., ,		rganization Name	Date of Receipt			
Mailing Address 4834 North Wishon Avenu	ie	<u></u>	08 13 2020			
City Fresno	State CA	Zip Code 93704	Transaction ID : A-846186  Amount of Each Receipt this Period			
FEC ID number of contributing federal political committee.	C		5000.00			
Name of Employer (for Individual) Harris Construction	Occ Bui	upation (for Individual) der	Memo Item			
Receipt For:  Primary General  Other (specify) ▼	Aggregate	Year-to-Date ▼ 5000.00	]			
Full Name of Individual (Last, First, Middle	e Initial) or Full C	rganization Name	Date of Receipt			
Mailing Address			M = M / D = D / Y = Y = Y			
City	State	Zip Code	Amount of Each Receipt this Period			
FEC ID number of contributing federal political committee.	C					
Name of Employer (for Individual)	Occ	upation (for Individual)	Memo Item			
Receipt For: Primary General Other (specify)	Aggregate	Year-to-Date ▼	1			
SUBTOTAL of Receipts This Page (optional	I)	)	7500.00			

TOTAL This Period (last page this line number only).....

7500.00

TEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page	(check only one)  11a 11b 11c <b>x</b> 12  13 14 15 16 17
	nd Statements may not be sold or used by any p	person for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full)  Vitoria PAC	the name and address of any political committee	e to solicit contributions from such committee.
Full Name of Individual (Last, First, Middle A. Borba, George, , ,	Initial) or Full Organization Name	Date of Receipt
Mailing Address 14467 Taft Hwy		M = M / D = D / Y = Y = Y
City Bakersfield	State Zip Code CA 93311	7 Transaction ID : A-953932  Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	2800.00
Name of Employer (for Individual) West Kern Dairy	Occupation (for Individual) Partner	★ Memo Item Transfer of raised funds
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼  2800.00	Memo Transfer from Joint Fundraiser-The Valadad Victory Fund on 08/31/20 for 4225.00
Full Name of Individual (Last, First, Middle Borba, Mark, , ,	Initial) or Full Organization Name	Date of Receipt
Mailing Address 11054 W Mt Whitney Ave		07 26 2020
City Riverdale	State Zip Code CA 93656	Transaction ID : A-846188  Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	2200.00
Name of Employer (for Individual) Self	Occupation (for Individual) Farmer	Transfer of raised funds
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼  2200.00	Memo Transfer from Joint Fundraiser-The Valadad Victory Fund on 07/31/20 for 3200.00
Full Name of Individual (Last, First, Middle Clark, Ron, , ,	Initial) or Full Organization Name	Date of Receipt
Mailing Address 7370 Avenue 228		09 15 2020
City Tulare	State Zip Code CA 93274	Transaction ID : A-1010696  Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	2200.00
Name of Employer (for Individual) Clarklind Farms	Occupation (for Individual) Owner	Memo Item Transfer of raised funds
Receipt For: Primary General Other (specify)	Aggregate Year-to-Date ▼  2200.00	Memo Transfer from Joint Fundraiser-The Valadad Victory Fund on 09/17/20 for 6600.00
SUBTOTAL of Receipts This Page (optional	)	0.00
TOTAL This Period (last page this line num	ber only)	

SCHEDULE A (FEC Form 3X) TEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE 8 OF 24 (check only one)  11a 11b 11c x 12 13 14 15 16 17
	Statements may not be sold or used by any phe name and address of any political committed	person for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full)  Vitoria PAC	The Harrie and address of any political committee	o to donoit contributions from ducir committee.
Full Name of Individual (Last, First, Middle A. Coelho, Joe, F., Mr., Jr.	Initial) or Full Organization Name	Date of Receipt
Mailing Address 4020 W Davis Ave	te s	09 05 Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
City Riverdale	State Zip Code CA 93656-9419	Transaction ID : A-984876  Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	2200.00
Name of Employer (for Individual) Terra Linda Farms	Occupation (for Individual) Farmer	Memo Item Transfer of raised funds
Receipt For:	Aggregate Year-to-Date ▼	Transfer of raised failed
Primary General Other (specify) ▼	2200.00	Memo Transfer from Joint Fundraiser-The Valad Victory Fund on 09/11/20 for 2116.27
Full Name of Individual (Last, First, Middle 3. Ellis, Stan, , ,	Initial) or Full Organization Name	Date of Receipt
Mailing Address P.O. Box 5427		09 04 2020
City	State Zip Code	Transaction ID : A-984874
Bakersfield	CA 93388	Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	С	1900.00
Name of Employer (for Individual) Sierra Process Systems, Inc  Occupation (for Individual) Manager		Memo Item Transfer of raised funds
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼	Memo Transfer from Joint Fundraiser-The Valada Victory Fund on 09/11/20 for 4100.00
Full Name of Individual (Last, First, Middle	Initial) or Full Organization Name	
C. Good, Albert, , ,	a., J a J.gamzador . lab	Date of Receipt
Mailing Address 501 Richgrove Drive		08 06 2020
City Delano	State Zip Code CA 93215	Transaction ID : A-953918  Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	2900.00
Name of Employer (for Individual) Castlerock Farming Transport	Occupation (for Individual) Agricultural Business Owner	Memo Item Transfer of raised funds
Receipt For: Primary General Other (specify)	Aggregate Year-to-Date ▼  2900.00	Memo Transfer from Joint Fundraiser-The Valad Victory Fund on 08/25/20 for 12028.46
		0.00

TEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER:   PAGE 9 OF 24   (check only one)
			erson for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full)  Vitoria PAC	the name and addr	ess of any political committe	e to solicit contributions from such committee.
Full Name of Individual (Last, First, Middle Good, Albert, , ,	Initial) or Full Orga	nization Name	Date of Receipt
Mailing Address 501 Richgrove Drive  City	State	Zip Code	09 18 2020
Delano	CA	93215	Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C		2100.00
Name of Employer (for Individual)  Castlerock Farming Transport	VIS-19-19-19-19-19-19-19-19-19-19-19-19-19-	tion (for Individual) rural Business Owner	Memo Item Transfer of raised funds
Receipt For:  Primary General  Other (specify) ▼	Aggregate Yea	ar-to-Date ▼ 5000.00	Memo Transfer from Joint Fundraiser-The Valada Victory Fund on 09/27/20 for 4135.55
Full Name of Individual (Last, First, Middle Grabow, Keith, , ,	Initial) or Full Orga	nization Name	Date of Receipt
Mailing Address 12522 9th Ave			08 25 2020
City Hanford	State CA	Zip Code 93230	Transaction ID : A-953931  Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C		1425.00
Name of Employer (for Individual) Grabow Well Drilling	Occupa Preside	tion (for Individual) ent	Transfer of raised funds
Receipt For:  Primary General  Other (specify) ▼	Aggregate Yea	ar-to-Date ▼ 1425.00	Memo Transfer from Joint Fundraiser-The Valada Victory Fund on 08/31/20 for 4225.00
Full Name of Individual (Last, First, Middle C. Grimm Marshall, Barbara, , ,	Initial) or Full Orga	nization Name	Date of Receipt
Mailing Address 7158 Buena Vista Rd			08 07 2020
City Bakersfield	State CA	Zip Code 93311	Transaction ID : A-953919
FEC ID number of contributing federal political committee.	C		Amount of Each Receipt this Period 5000.00
Name of Employer (for Individual) Grimmway Farms	Occupa Owner	tion (for Individual)	Memo Item Transfer of raised funds
Receipt For: Primary General Other (specify)	Aggregate Yea	ar-to-Date ▼ 5000.00	Memo Transfer from Joint Fundraiser-The Valada Victory Fund on 08/25/20 for 12028.46
SUBTOTAL of Receipts This Page (optional)		)	0.00
TOTAL This Period (last page this line numb	er only)		

TEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page	Check only one
	nd Statements may not be sold or used by any p the name and address of any political committe	person for the purpose of soliciting contributions
Vitoria PAC		
Full Name of Individual (Last, First, Middle Gudmundson, Lynn, , ,	e Initial) or Full Organization Name	Date of Receipt
Mailing Address 7208 Fountain Valley Driv	re	09 04 Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
City Bakersfield	State Zip Code CA 93308	Transaction ID : A-984873  Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	2200.00
Name of Employer (for Individual) Premier Equipment Rental	Occupation (for Individual) CEO	Memo Item     Transfer of raised funds
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼  2200.00	Memo Transfer from Joint Fundraiser-The Valada Victory Fund on 09/11/20 for 4100.00
Full Name of Individual (Last, First, Middle Higby, Larry, , , Mailing Address 823 Via Lido Soud	e Initial) or Full Organization Name	Date of Receipt
City	State Zip Code	09 17 2020
Newport Beach	CA 92663	Transaction ID : A-1201003  Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	2200.00
Name of Employer (for Individual) None	Occupation (for Individual) Retired	★ Memo Item Transfer of raised funds
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼  2200.00	Memo Transfer from Joint Fundraiser-The Valada Victory Fund on 09/27/20 for 4135.55
Full Name of Individual (Last, First, Middle Holland, Alicia, , ,	m (1995) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996)	Date of Receipt
Mailing Address 3740 West Caldwell Aven	ue	07 26 2020
City Visalia	State Zip Code CA 93277	Transaction ID : A-846189  Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	1000.00
Name of Employer (for Individual) Pioneer Nursery	Occupation (for Individual) Farmer	➤ Memo Item  Transfer of raised funds
Receipt For: Primary General Other (specify)	Aggregate Year-to-Date ▼ 1000.00	Memo Transfer from Joint Fundraiser-The Valada Victory Fund on 07/31/20 for 3200.00
SUBTOTAL of Receipts This Page (optional	)	0.00
TOTAL This Period (last page this line num	ber only)	

SCHEDULE A (FEC Form 3X	Use separate schedule(s)	FOR LINE NUMBER: PAGE 11 OF 24 (check only one)	
TEMIZED RECEIPTS	for each category of the Detailed Summary Page	11a 11b 11c <b>x</b> 12 13 14 15 16 17	
Any information copied from such Reports an or for commercial purposes, other than using	d Statements may not be sold or used by any p the name and address of any political committe	person for the purpose of soliciting contributions be to solicit contributions from such committee.	
NAME OF COMMITTEE (In Full) Vitoria PAC			
Full Name of Individual (Last, First, Middle Lewis, Edward, , ,	Initial) or Full Organization Name	Date of Receipt	
Mailing Address 10100 Empyrean Way # 2	04	09 09 1 2020	
City Los Angeles	State Zip Code CA 90067	Transaction ID : A-1010694  Amount of Each Receipt this Period	
FEC ID number of contributing federal political committee.	C	2800.00	
Name of Employer (for Individual) Edward Lewis	Occupation (for Individual) Investments	Memo Item Transfer of raised funds	
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼  2800.00	Memo Transfer from Joint Fundraiser-The Vala Victory Fund on 09/17/20 for 2693.45	
Full Name of Individual (Last, First, Middle . Marshall, Darcy, , ,	Initial) or Full Organization Name	Date of Receipt	
Mailing Address 7158 Buena Vista Rd	2 0	08 07 Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y	
City Bakersfield	State Zip Code CA 93311	Transaction ID : A-953920  Amount of Each Receipt this Period	
FEC ID number of contributing federal political committee.	C	5000.00	
Name of Employer (for Individual) None	Occupation (for Individual) Retired	Memo Item Transfer of raised funds	
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼ 5000.00	Memo Transfer from Joint Fundraiser-The Vala Victory Fund on 08/25/20 for 12028.46	
Full Name of Individual (Last, First, Middle The Valadao Victory Fund	Initial) or Full Organization Name	Date of Receipt	
Mailing Address 5132 N Palm Ave #227  City	State Zip Code	07 31 2020 Transaction ID : A-846187	
Fresno	CA 93704	Amount of Each Receipt this Period	
FEC ID number of contributing federal political committee.	C C00715102	3200.00	
Name of Employer (for Individual)	Occupation (for Individual)	Memo Item	
Receipt For: Primary General Other (specify)	Aggregate Year-to-Date ▼ 46983.25	Transfer from Joint Fundraiser	
SUBTOTAL of Receipts This Page (optional)	)	3200.00	
TOTAL This Period (last page this line numb			

SCHEDULE A	(FEC	Form	3X)
ITEMIZED REC	FIPTS		

TEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page	Check only one)
Any information copied from such Reports and Statements	* *	13 14 15 16 17
or for commercial purposes, other than using the name ar		
NAME OF COMMITTEE (In Full) Vitoria PAC		
Full Name of Individual (Last, First, Middle Initial) or Fu A. The Valadao Victory Fund	II Organization Name	Date of Receipt
Mailing Address 5132 N Palm Ave #227		M = M / D = D / Y = Y = Y = Y
City State	Zip Code	08 25 2020 Transaction ID : A-953917
Fresno CA	93704	Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C00715102	12028.46
Name of Employer (for Individual)	Occupation (for Individual)	Memo Item
Receipt For:  Primary General  Other (specify) ▼	ate Year-to-Date ▼ 59011.71	Transfer from Joint Fundraiser
Full Name of Individual (Last, First, Middle Initial) or Fu The Valadao Victory Fund	II Organization Name	Date of Receipt
Mailing Address 5132 N Palm Ave #227		08 31 2020
City State	Zip Code	Transaction ID : A-953930
Fresno CA	93704	Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C00715102	4225.00
Name of Employer (for Individual)	Occupation (for Individual)	Memo Item
	ate Year-to-Date ▼	1
Primary General Other (specify) ▼	63236,71	Transfer from Joint Fundraiser
Full Name of Individual (Last, First, Middle Initial) or Fu  C. The Valadao Victory Fund	II Organization Name	Date of Receipt
Mailing Address 5132 N Palm Ave #227		09 11 Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
City State Fresno CA	Zip Code	Transaction ID : A-984872
	93704	Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C00715102	4100.00
(5) 88 USS (574)	Occupation (for Individual)	Memo Item Transfer of raised funds
Receipt For:  Primary General  Other (specify)  Aggreg	ate Year-to-Date ▼ 69452.98	Transfer from Joint Fundraiser
SUBTOTAL of Receipts This Page (optional)	<b>&gt;</b>	20353.46
TOTAL This Period (last page this line number only)	<u> </u>	

SCHEDULE A (FEC Form 3)	Use separate schedule(s)	FOR LINE NUMBER: PAGE 13 OF 24 (check only one)	
TEMIZED RECEIPTS	for each category of the Detailed Summary Page	11a 11b 11c <b>x</b> 12	
		y person for the purpose of soliciting contributions ttee to solicit contributions from such committee.	
NAME OF COMMITTEE (In Full) Vitoria PAC			
Full Name of Individual (Last, First, Middle A. The Valadao Victory Fund	e Initial) or Full Organization Name	Date of Receipt	
Mailing Address 5132 N Palm Ave #227	<i>a</i>	09 11 2020	
City Fresno	State Zip Code CA 93704	Transaction ID : A-984875  Amount of Each Receipt this Period	
FEC ID number of contributing federal political committee.	C C00715102	2116.27	
Name of Employer (for Individual)	Occupation (for Individual)	Memo Item Transfer of raised funds	
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼ 69452.98	Transfer from Joint Fundraiser	
Full Name of Individual (Last, First, Middle The Valadao Victory Fund	e Initial) or Full Organization Name	Date of Receipt	
Mailing Address 5132 N Palm Ave #227		09 17 2020	
City Fresno	State Zip Code CA 93704	Transaction ID : A-1010693  Amount of Each Receipt this Period	
FEC ID number of contributing federal political committee.	C C00715102	2693.45	
Name of Employer (for Individual)	Occupation (for Individual)	Memo Item	
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼  78746.43	Transfer from Joint Fundraiser	
Full Name of Individual (Last, First, Middle The Valadao Victory Fund	e Initial) or Full Organization Name	Date of Receipt	
Mailing Address 5132 N Palm Ave #227	S &	09 17 Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y	
City Fresno	State Zip Code CA 93704	Transaction ID : A-1010695  Amount of Each Receipt this Period	
FEC ID number of contributing federal political committee.	C C00715102	6600.00	
Name of Employer (for Individual)	Occupation (for Individual)	Memo Item	
Receipt For: Primary General Other (specify)	Aggregate Year-to-Date ▼  78746.43	Transfer from Joint Fundraiser	
SUBTOTAL of Receipts This Page (optional	n)	11409.72	
TOTAL This Period (last page this line num	ber only)		

SCHEDULE A (FEC Form 3) TEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE 14 OF 24 (check only one)  11a 11b 11c x 12 13 14 15 16 17
	nd Statements may not be sold or used by any p the name and address of any political committe	person for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full)  Vitoria PAC	The name and address of any political committee	e to solicit contributions from such committee.
Full Name of Individual (Last, First, Middle A. The Valadao Victory Fund	e Initial) or Full Organization Name	Date of Receipt
Mailing Address 5132 N Palm Ave #227	0e 30	09 27 Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
City Fresno	State Zip Code CA 93704	Transaction ID : A-1201002  Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C C00715102	4135.55
Name of Employer (for Individual)	Occupation (for Individual)	Memo Item
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼  82881.98	Transfer from Joint Fundraiser
Full Name of Individual (Last, First, Middle Toor, Bitta, , ,	e Initial) or Full Organization Name	Date of Receipt
Mailing Address 5610 North Palm Avenue	9	09 15 2020
City Fresno	State Zip Code CA 93704	Transaction ID : A-1010697
FEC ID number of contributing federal political committee.	C	Amount of Each Receipt this Period  2200.00
Name of Employer (for Individual) Prosperity Farms	Occupation (for Individual) Partner	Memo Item Transfer of raised funds
Receipt For:  Primary General  Other (specify) ▼	Aggregate Year-to-Date ▼  2200.00	Memo Transfer from Joint Fundraiser-The Valada Victory Fund on 09/17/20 for 6600.00
Full Name of Individual (Last, First, Middle Yurosek, Jeff, , ,	e Initial) or Full Organization Name	Date of Receipt
Mailing Address 1903 Mineral Ct  City	State Zip Code	09 16 2020 Transaction ID : A-1010698
Bakersfield	CA 93308	Amount of Each Receipt this Period
FEC ID number of contributing federal political committee.	C	2200.00
Name of Employer (for Individual) Yurosek Farming Company, LLC Receipt For:	Occupation (for Individual) Owner  Aggregate Year-to-Date ▼	Memo Item Transfer of raised funds
Primary General Other (specify)	Aggregate Year-to-Date ▼ 2200.00	Memo Transfer from Joint Fundraiser-The Valada Victory Fund on 09/17/20 for 6600.00
SUBTOTAL of Receipts This Page (optional	) <b>)</b>	4135.55
TOTAL This Period (last page this line num	ber only)	39098.73

SCHEDOLE B (FEC FOIII 3X)			NUMBER: PAGE 15 OF 24	
TEMIZED DISBURSEMENTS	for each category of the		one) 22 23 26 27	
	Detailed Summary Page	28a	28b 28c 29 30b	
Any information copied from such Reports and Statem or for commercial purposes, other than using the name				
NAME OF COMMITTEE (In Full)		THE PARTY OF THE P		
Vitoria PAC				
Full Name (Last, First, Middle Initial)			Date of Disbursement	
A. Kramer & Associates			Mam / Dab / Yayayay	
Mailing Address 2201 Francisco Drive Suite 140-183			08 01 2020	
1900 ft r	State Zip Code		FEC Identification Number	
El Dorado Hills Purpose of Disbursement	CA 95762		C	
Fundraising Consultant		001	Transaction ID : B-753139	
Candidate Name	· I	Category/ Type	Amount of Each Disbursement this Period	
Office Sought: House Disbursem	NEWSCHOOL OF THE SECOND STATE OF THE SECOND ST	2647656204	9987.00	
to a constant of the constant	Primary General Other (specify) ▼			
State: District:	Outor (apecity) ▼		Memo Item	
Full Name (Last, First, Middle Initial)			60 1 STOR-8016	
Renteria, Andrew, , ,			Date of Disbursement	
Mailing Address 2023 Magnolia Ave			07 02 2020	
Zuzo Wagiiulia Ave			5. 02 2020	
2	State Zip Code		FEC Identification Number	
Sanger Purpose of Disbursement	CA 93657		C	
Fundraising consulting 001			Transaction ID : B-732647	
Candidate Name  Category/ Type			Amount of Each Disbursement this Period	
Office Sought: House Disbursem	AND	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	4904.81	
	Primary General Other (specify)			
State: District:	Outor (specify)		Memo Item	
Full Name (Last, First, Middle Initial)			2000	
Renteria, Andrew, , ,			Date of Disbursement	
Mailing Address 2023 Magnolia Ave			08 03 2020	
Section 199	State Zip Code		FEC Identification Number	
Sanger Purpose of Disbursement	CA 93657	477		
Fundraising consulting		001	C Transaction ID : B 753141	
Candidate Name Category/			Transaction ID: B-753141 Amount of Each Disbursement this Period	
Office Sought: House Disbursem	nent For:	Type	4904.81	
Senate Primary General				
	Other (specify) ▼		Memo Item	
State: District:				
SUBTOTAL of Disbursements This Page (optional)		<b>_</b> _	19796.62	
TOTAL This Period (last page this line number only).			, ,	

ITEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the Detailed Summary Page (check or 218	22 23 26 27
Any information copied from such Reports and States or for commercial purposes, other than using the nar NAME OF COMMITTEE (In Full)  Vitoria PAC	ments may not be sold or used by any pe	rson for the purpose of soliciting contributions
Full Name (Last, First, Middle Initial)  A. Renteria, Andrew, , ,  Mailing Address 2023 Magnolia Ave		Date of Disbursement  M M M / D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Sanger Purpose of Disbursement Fundraising consulting Candidate Name	State Zip Code 93657  001  Category/ Type  ment For: 2020  Primary  General Other (specify)    State 21    Other (specify)    Category/ Type	FEC Identification Number  C  Transaction ID: B-1072692  Amount of Each Disbursement this Period  4904.81  Memo Item
Fresno Purpose of Disbursement Treasury services Candidate Name	State Zip Code CA 93704  001  Category/ Type  ment For: Primary General	Date of Disbursement  M M / D D / 2020  FEC Identification Number  C  Transaction ID: B-753140  Amount of Each Disbursement this Period  6200.78
State: District:  Full Name (Last, First, Middle Initial)  C. Valley Vision Treasury  Mailing Address 5132 N Palm Ave #227  City	Other (specify)  State Zip Code	Date of Disbursement  M M / D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Fresno Purpose of Disbursement Treasury services Candidate Name	CA 93704  O01  Category/ Type  ment For: 2020  Primary  General  Other (specify)    Output  Other (specify)    Output  Output	FEC Identification Number  C  Transaction ID : B-1072693  Amount of Each Disbursement this Period  5079.40  Memo Item

SCHEDULE B (FEC FOIII 3X)	Lies constate ashedule(s)	FOR LINE NUMBER: PAGE 17 OF 24				
ITEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the Detailed Summary Page	(check only one)    X   21b   22   23   26   27     28a   28b   28c   29   30b				
Any information copied from such Reports and Statem	ents may not be sold or used	by any person for the purpose of soliciting contributions				
or for commercial purposes, other than using the name	e and address of any political of	committee to solicit contributions from such committee.				
NAME OF COMMITTEE (In Full)  Vitoria PAC						
Full Name (Last, First, Middle Initial)  A. Valley Vision Treasury		Date of Disbursement				
Mailing Address 5132 N Palm Ave #227		09 30 7 2020				
	State Zip Code	FEC Identification Number				
Fresno Purpose of Disbursement	CA 93704					
Treasury services  Candidate Name	[	001 C Transaction ID : B-1206335				
	(	category/ Amount of Each Disbursement this Period				
Office Sought: House Disbursem Senate I	nent For: Primary General	7791.60				
State: President O	Other (specify) ▼	Memo Item				
Full Name (Last, First, Middle Initial)		ACC 90004999				
В.		Date of Disbursement				
Mailing Address	Mailing Address					
City	State Zip Code	FEC Identification Number				
Purpose of Disbursement	,	C				
Candidate Name		Category/ Amount of Each Disbursement this Period				
	nent For: Primary General Other (specify)					
State: District:	d.t. 56	Memo Item				
Full Name (Last, First, Middle Initial)		Date of Disbursement				
Mailing Address		M = M / D = D / Y = Y = Y				
City	Zip Code	FEC Identification Number				
Purpose of Disbursement	C					
Candidate Name	Category/ Amount of Each Disbursement this Period Type					
Office Sought: House Disbursem Senate F						
State: President Oistrict:	Other (specify) ▼	Memo Item				
SUBTOTAL of Disbursements This Page (optional)		7791.60				
TOTAL This Period (last page this line number only).		43773.21				

Llea congrata cohodula(a)		FOR LINE NUMBER: PAGE 18 OF 24						
for each category of the Detailed Summary Page	tegory of the							
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.								
Full Name (Last, First, Middle Initial)  The Valadao Victory Fund  Mailing Address 5132 N Palm Ave #227								
. le a		07 16 2020						
CA Zip Code 93704		FEC Identification Number						
	008	C C00715102 Transaction ID : B-887579						
	Category/ Type	Amount of Each Disbursement this Period						
nent For:  Primary General  Other (specify)		Memo Item						
	-	I III III III III						
		Date of Disbursement						
Mailing Address								
City State Zip Code								
Purpose of Disbursement								
	Category/ Type	Amount of Each Disbursement this Period						
nent For: Primary General Other (specify)								
		Memo Item						
		Date of Disbursement						
State Zip Code		FEC Identification Number						
Purpose of Disbursement								
Candidate Name Category/								
Office Sought: Disbursement For:								
President Other (specify) ▼ Memo Item								
SUBTOTAL of Disbursements This Page (optional)								
TOTAL This Period (last page this line number only)								
	ent For: Primary General Other (specify)  tate Zip Code  and address of any politic  cent For: Primary General Other (specify)  tate Zip Code  and address of any politic  cent For: Code  cent For: Code	Use separate schedule(s) for each category of the Detailed Summary Page  ents may not be sold or used by any person e and address of any political committee to separate state  tate  Zip Code CA  93704   O08  Category/ Type  ent For:  Primary  General  Other (specify)  Category/ Type  control  Category/ Type  control  Category/ Type  Category/ Type  Category/ Type  Category/ Type  Category/ Type  Control  Contr						

	CHEDOLE B (FEC FOIII 3X)				IE NUMBER: PAGE 19 OF 24		
ITEMIZED DISBURSEMENTS		for each category of the		(check only	one) 22 🗶 23 26 27		
		Detailed S	Summary Page	28a	28b 28c 29 30b		
	ny information copied from such Reports and Staterr for commercial purposes, other than using the name						
$\rangle$	NAME OF COMMITTEE (In Full) Vitoria PAC						
Α.	Full Name (Last, First, Middle Initial) Ann Wagner for Congress  Mailing Address PO Box 50		Date of Disbursement  M M M / D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y				
		25	Tests = 5		30 10 2020		
	930 P	State MO	Zip Code 63022		FEC Identification Number		
	Purpose of Disbursement Contr bution Candidate Name			011	C H2MO02102  Transaction ID : B-1206346		
	Wagner, Ann, , ,			Category/ Type	Amount of Each Disbursement this Period		
	Office Sought: House Disbursem	nent For: 2 Primary Other (spec	<b>★</b> General		1500.00		
	State: MO District: 02	X-E			Memo Item		
ь	Full Name (Last, First, Middle Initial)				Date of Disbursement		
о.	Balderson for Congress				Man / Dad / Yayayay		
Mailing Address 4679 Winterset Dr 09 23 2020							
		State OH	Zip Code 43220-8113		FEC Identification Number		
	Purpose of Disbursement				C C00662650  Transaction ID : B-1206352  Amount of Each Disbursement this Period		
	Candidate Name			011 Category/			
	Balderson, Troy, , , Office Sought:   K   House   Disbursem	nent For: 2	2020	Туре	2800.00		
	Senate Primary General  President Other (specify)				Memo Item		
	State: OH District: 12 Full Name (Last, First, Middle Initial)						
C.	Bice for Congress				Date of Disbursement		
	Mailing Address PO Box 21315				08 28 2020		
	STATE OF THE PROPERTY OF THE P	State	Zip Code		FEC Identification Number		
	Oklahoma City Purpose of Disbursement Contribution	OK	73156	011	C C00703843		
	Candidate Name Bice, Stephanie, , ,  Category/ Type				Transaction ID: B-1206343  Amount of Each Disbursement this Period		
	Office Sought: House Disbursement For: 2020 Senate Primary General				2800.00		
	President Other (specify) ▼  State: OK District: 05  Memo Item						
S	SUBTOTAL of Disbursements This Page (optional)						
Т	TOTAL This Period (last page this line number only)						
-	153.65						

## SCHEDIII E B /EEC Form 3V)

ITEMIZED DISPUBLICATION	Use separate schedule(s)	FOR LINE NUMBER: (check only one)		
ITEMIZED DISBURSEMENTS	for each category of the Detailed Summary Page		26 27	
		28a 28b 28c	29 30b	
Any information copied from such Reports and Statemer or for commercial purposes, other than using the name				
NAME OF COMMITTEE (In Full) Vitoria PAC				
A. Dale Crafts for Congress  Mailing Address PO Box 236	Date of Disbursement of Disbur	ent		
05.	7:- O-d-			
	sbon ME 04250 urpose of Disbursement			
Senate	Candidate Name  Crafts, Dale, , ,  Office Sought:    K   House   Disbursement For: 2020			
B. Don Bacon for Congress  Mailing Address P.o. Box 391368	Date of Disbursement of Disbur	2020		
Omaha Purpose of Disbursement Contribution	Omaha NE 68139 Purpose of Disbursement			
Senate	ent For: 2020 Primary 🗶 General Other (specify)	Category/ Type  Amount of Each Di  Memo Item	sbursement this Period 2000.00	
C. Elise for Congress  Mailing Address PO Box 500		Date of Disbursement of Disbur	2020	
Glens Falls Purpose of Disbursement Contribution  Candidate Name  Stefanik, Elise, M., ,  Office Sought:   House Senate  Bisbursem	tate Zip Code NY 12801  Ident For: 2020 Primary ★ General Other (specify) ▼	011 Category/ Type  FEC Identification N C C00547893  Transaction ID Amount of Each Di  Memo Item		
SUBTOTAL of Disbursements This Page (optional)			6800.00	
TOTAL This Period (last page this line number only)		<b>.</b>		

## SCHEDIII E B /EEC Form 3V)

SCHEDULE B (FEC FOIIII 3X)	Use separate schedule(s)	TOTT LINE NOWIDETT.			
ITEMIZED DISBURSEMENTS	for each category of the	(check only one) 21b 22 <b>x</b> 23 26 27			
	Detailed Summary Page 28:				
		d by any person for the purpose of soliciting contribution of committee to solicit contributions from such committee			
NAME OF COMMITTEE (In Full) Vitoria PAC					
Full Name (Last, First, Middle Initial)  A. Hudson for Congress  Mailing Address PO Box 5053	Date of Disbursement  M = M / D = D / Y = Y = Y = Y  09 25 2020	]			
City Concord Purpose of Disbursement Contr bution Candidate Name Hudson, Richard, L, , Jr. Office Sought:    K   House   Disbursement	Transaction ID: B-1206334 Amount of Each Disbursement this Per 2800.00  Memo Item	riod			
State: NC District: 08  Full Name (Last, First, Middle Initial)  B. John Carter for Congress	Date of Disbursement	1			
100	State Zip Code TX 78683	FEC Identification Number  C H2TX31044	1		
Senate	nent For: 2020 Primary 🗶 General Other (specify)	Category/ Type  Transaction ID : B-1206347  Amount of Each Disbursement this Per  1500.00  Memo Item	riod		
Full Name (Last, First, Middle Initial)  C. McCaul for Congress  Mailing Address 815 A Brazos Street		Date of Disbursement  09 18 2020	]		
Austin Purpose of Disbursement Contribution  Candidate Name  McCaul, Michael, , ,  Office Sought: House Disbursem Senate	tate Zip Code TX 78701  ment For: 2020  Primary ★ General Other (specify) ▼	Transaction ID: B-1206345 Amount of Each Disbursement this Per 2800.00  Memo Item	riod		
SUBTOTAL of Disbursements This Page (optional)		7100.00	1,100		
TOTAL This Period (last page this line number only).					

ITEMIZED DISBURSEMENTS		PR LINE NUMBER: PAGE 22 OF 24  eeck only one)  21b
Any information copied from such Reports and Statem or for commercial purposes, other than using the name		any person for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full)  Vitoria PAC	e and address of any political com	militee to solicit contributions from such committee.
Full Name (Last, First, Middle Initial)  A. McClintock for Congress  Mailing Address 2150 River Plaza Dr, Suite 150		Date of Disbursement  M M M / D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Sacramento Purpose of Disbursement Contr bution  Candidate Name  McClintock, Thomas, , ,  Office Sought:     House   Disbursem		FEC Identification Number  C H8CA04152  Transaction ID : B-1206338  Amount of Each Disbursement this Period  2000.00  Memo Item
Full Name (Last, First, Middle Initial)  B. Michelle Steel for Congress  Mailing Address 92a Surfside Avenue, #472	Date of Disbursement  M = M / D = D / Y = Y = Y = Y = Y = Y = Y = Y = Y = Y	
Surfside Purpose of Disbursement Contribution  Candidate Name Steel, Michelle, , ,  Office Sought:     House   Disbursement	Cate Ty	FEC Identification Number  C C00704981  Transaction ID : B-1206351  Amount of Each Disbursement this Period  2800.00  Memo Item
Full Name (Last, First, Middle Initial)  C. Mike Garcia Victory Fund  Mailing Address 9070 Irvine Center Drive #150		Date of Disbursement  M M M / D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Irvine Purpose of Disbursement Contribution  Candidate Name  Garcia, Mike, , ,  Office Sought:     House   Disbursement	Cate	FEC Identification Number  C C00701102  Transaction ID : B-1206392  Amount of Each Disbursement this Period  2800.00  Memo Item
SUBTOTAL of Disbursements This Page (optional)		7600.00
TOTAL This Period (last page this line number only).		

## SCHEDIII E B /EEC Form 3V)

SCHEDULE B (FEC FOIII 5X)	Use separate schedule(s)	FOR LINE NUMBER: PAGE 23 OF 24		
ITEMIZED DISBURSEMENTS	for each category of the	(check only one) ☐ 21b ☐ 22 <b>★</b> 23 ☐ 26 ☐ 27		
	Detailed Summary Page 28:			
		by any person for the purpose of soliciting contributions committee to solicit contributions from such committee.		
NAME OF COMMITTEE (In Full) Vitoria PAC				
A. Palazzo for Congress  Mailing Address P.O Box 4634	Date of Disbursement  M = M / D = D / Y = Y = Y = Y = Y = Y = Y = Y = Y = Y			
City Biloxi Purpose of Disbursement Contr bution  Candidate Name Palazzo, Steven, McCarty, Office Sought:    March   March   March   March	Transaction ID : B-1206344 Amount of Each Disbursement this Period  Amount of Each Disbursement this Period			
State: MS District: 04  Full Name (Last, First, Middle Initial)	Other (specify) ▼	Memo Item		
B. Scott Taylor for Congress  Mailing Address PO Box 71596	Date of Disbursement  M M M / D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y			
Richmond Purpose of Disbursement Contribution				
Senate President C	nent For: 2020 Primary 🗶 General Other (specify)	Category/ Type  Transaction ID : B-1206342  Amount of Each Disbursement this Period  2800.00  Memo Item		
C. Texans for Ronny Jackson  Mailing Address P.o. Box 53058		Date of Disbursement  M M J D D J Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y		
Amarillo Purpose of Disbursement Contribution  Candidate Name  Jackson, Ronny, Lynn, ,  Office Sought: House Disbursem Senate	tate Zip Code TX 79159  The state Zip Code 79159	Transaction ID: B-1206332 Amount of Each Disbursement this Period  Memo Item		
SUBTOTAL of Disbursements This Page (optional)		8400.00		
TOTAL This Period (last page this line number only)				

SCHEDULE B (FEC FOIIII 3X)	Harris and another state of the Astronomy	FOR LINE NUMBER: PAGE 24 OF 24	F		
TEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the	(check only one) 21b 22 <b>x</b> 23 26 27			
	Detailed Summary Page — 28a				
		d by any person for the purpose of soliciting contributions all committee to solicit contributions from such committee.	Ī		
NAME OF COMMITTEE (In Full) Vitoria PAC					
Full Name (Last, First, Middle Initial)  A. Tony Gonzales for Congress	Date of Disbursement				
Mailing Address 1112 E Euclid Ave		09 23 _ 2020 _			
[12]	ose of Disbursement				
Candidate Name  Gonzales, Tony, , ,  Office Sought:   M House Disbursem	Name es, Tony, , ,  Category/ Type				
State: TX District: 23					
Full Name (Last, First, Middle Initial)  B. Young Kim for Congress  Mailing Address 9460 Tegner Road		Date of Disbursement  M M M / D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y			
	State Zip Code CA 95324	FEC Identification Number  C C00665638			
Candidate Name  Kim, Young, , ,  Office Sought:   House Disbursem	Category/ Type  Transaction ID : B-1206350  Amount of Each Disbursement this Period  2800.00				
State: CA District: 39	Memo Item				
Full Name (Last, First, Middle Initial)  C.  Mailing Address		Date of Disbursement			
	State Zip Code		_		
Purpose of Disbursement		FEC Identification Number			
Candidate Name	Category/ Type  Amount of Each Disbursement this Period	ľ			
Office Sought: House Disbursem  Senate President	Mome Hom				
State: District:	Other (specify) ▼	Memo Item			
SUBTOTAL of Disbursements This Page (optional)		4800.00			
TOTAL This Period (last page this line number only).		41800.00			

### FEC FORM 3X

# REPORT OF RECEIPTS AND DISBURSEMENTS

FORM	/I 3X For	Other	Than An Autho	orized C	ommittee			Office U	se Only	
1. NAME (	OF TY TTEE (in full)	PE OR I	PRINT ▼		le: If typing, ne lines.	type	12FE	4 <b>M</b> 5		
Vitoria F	PAC	N N S		r r r	T T F F	F F F	15 15 15 15		1 9 9 9	1
F p p q q	9 9 9 9 9 9 9	N N S		Y Y Y	* * * * *	pr 12 12	12 12 12	6 6 6 9 9		3 3 3 1
	1	5132 Nor	th Palm Avenue	S: 22 22						
ADDRESS (r	number and street)	#227		TTT	<u> </u>	ř ř ř	P P		b. b. b.	
Che thai	eck if different n previously orted. (ACC)	Fresno					CA	93704	<u>'</u>	
2. FEC ID	ENTIFICATION NUM	BER ▼	CITY	<b>A</b>			STATE A	i .	ZIP COD	DE ▲
C	C00712695		3. IS	THIS PORT	NEV (N)	or	x	AMENDED (A)		
4. TYPE (Choose	OF REPORT One)	(b) Mon Rep Due	ort —	0 (M2) 0 (M3)		20 (M5) 20 (M6)		Aug 20 (M8) Sep 20 (M9)	П	Nov 20 (M11) (Non-Election Year Only) Dec 20 (M12)
(a) Qua	arterly Reports:			0 (M4)		20 (M7)	Н	Oct 20 (M10)	-	(Non-Election Year Only) Jan 31 (YE)
	April 15 Quarterly Report (Q1)							ALMANOSTA VI		
	July 15 Quarterly Report (Q2)	(c)	12-Day PRE-Election Report for the:		imary (12P) onvention (120	-		neral (12G) ecial (12S)	Ц	Runoff (12R)
	October 15 Quarterly Report (Q3)		report for the.						ar tear	
	January 31 Year-End Report (YE)		Election	on		01	1900		in the State of	CA
	July 31 Mid-Year Report (Non-election Year Only) (MY)	(d)	30-Day  POST-Election  Report for the:	Ge	eneral (30G)	Ţ	Rur	noff (30R)		Special (30S)
	Termination Report (TER)		Election	on	M = M / D	= D /	Y = Y =	( - Y	in the State of	
5. Coverinç	g Period 10	01			through	м = м 10	14	D / Y Y 20	20 20	
	I have examined this t Name of Treasurer	Report a Allen, Me		ny knowle	dge and beli	ef it is tro	ue, corre	ct and comple	te.	-
Signature of	Allen, M	elissa, , ,					Date	M = M / D	= D /	2020
NOTE: Subm	ission of false, erroneou	is, or inco	omplete information	may subje	ct the person	signing t	his Repor	t to the penalti	es of 52 l	J.S.C. § 30109
ı   u	fice Ise nlv							100 100 000	FORI Rev. 05/20	

### SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016) Page 2 Write or Type Committee Name Vitoria PAC 10 2020 14 2020 Report Covering the Period: From: To: COLUMN A COLUMN B This Period Calendar Year-to-Date (a) Cash on Hand 59990.59 January 1, 2020 (b) Cash on Hand at 73246.91 Beginning of Reporting Period..... 8400.00 138781.98 (c) Total Receipts (from Line 19) ..... (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 81646.91 198772.57 6(a) and 6(c) for Column B)..... 15684.81 132810.47 Total Disbursements (from Line 31)..... Cash on Hand at Close of 8. Reporting Period 65962.10 65962.10 (subtract Line 7 from Line 6(d))..... Debts and Obligations Owed TO the Committee (Itemize all on 0.00 Schedule C and/or Schedule D) ..... 10. Debts and Obligations Owed BY the Committee (Itemize all on 0.00 Schedule C and/or Schedule D) ..... This committee has qualified as a multicandidate committee. (see FEC FORM 1M) For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-694-1100

of Receipts

FEC Form 3X (Rev. 05/2016) Page 3

Write or Type Committee Name Vitoria PAC 01 10 2020 10 14 2020 Report Covering the Period: From: To: COLUMN A COLUMN B I. Receipts **Total This Period** Calendar Year-to-Date 11. Contributions (other than loans) From: (a) Individuals/Persons Other Than Political Committees 8400.00 55900.00 (i) Itemized (use Schedule A)..... 0.00 0.00 (ii) Unitemized ..... (iii) TOTAL (add 55900.00 8400.00 Lines 11(a)(i) and (ii)..... 0.00 0.00 (b) Political Party Committees ..... (c) Other Political Committees 0.00 0.00 (such as PACs)..... (d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry 55900.00 8400.00 Totals to Line 33, page 5) ..... 12. Transfers From Affiliated/Other 0.00 82881.98 Party Committees..... 0.00 0.00 13. All Loans Received ..... 0.00 0.00 14. Loan Repayments Received..... 15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) 0.00 0.00 (Carry Totals to Line 37, page 5)..... 16. Refunds of Contributions Made to Federal Candidates and Other Political Committees..... 0.00 0.00 17. Other Federal Receipts 0.00 (Dividends, Interest, etc.)..... 0.00 18. Transfers from Non-Federal and Levin Funds (a) Non-Federal Account 0.00 0.00 (from Schedule H3) ..... 0.00 0.00 (b) Levin Funds (from Schedule H5) ....... (c) Total Transfers (add 18(a) and 18(b)).. 0.00 0.00 19. Total Receipts (add Lines 11(d), 138781.98 12, 13, 14, 15, 16, 17, and 18(c))...... 8400.00 20. Total Federal Receipts 8400.00 (subtract Line 18(c) from Line 19) ....... 138781.98

of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements		Total This Period	
Operating Expenditures:     (a) Allocated Federal/Non-Federal     Activity (from Schedule H4)			Calendar Year-to-Date
	(i) Federal Share	0.00	0.00
	(ii) Non-Federal Share	0.00	0.00
	(b) Other Federal Operating	10004.04	GEOGA 47
	Expenditures	10884.81	65954.47
	(add 21(a)(i), (a)(ii), and (b))	10884.81	65954.47
2.	Transfers to Affiliated/Other Party		
3	Contributions to	0.00	16.00
	Federal Candidates/Committees and Other Political Committees	4800.00	66800.00
4.	Independent Expenditures	0.00	0.00
5.	(use Schedule E)	0.00	0.00
	(use Schedule F)	0.00	0.00
6.	Loan Repayments Made	0.00	0.00
	Loans Made	0.00	0.00
<b></b>	Refunds of Contributions To: (a) Individuals/Persons Other		
	Than Political Committees	0.00	0.00
	(b) Political Party Committees	0.00	0.00
	(c) Other Political Committees (such as PACs)	0.00	0.00
	(d) Total Contribution Refunds	0.00	0.00
	(add Lines 28(a), (b), and (c))	0.00	0.00
9.	Other Disbursements (Including		
	Non-Federal Donations)	0.00	40.00
0.	Federal Election Activity (52 U.S.C. § 301016 (a) Allocated Federal Election Activity (from Schedule H6)	(20))	
	(i) Federal Share	0.00	0.00
	(ii) II outpl! Chara		0.00
	(ii) "Levin" Share(b) Federal Election Activity Paid	0.00	0.00
	Entirely With Federal Funds	0.00	0.00
	(c) Total Federal Election Activity (add		
	Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
	Total Disbursements (add Lines 21(c), 22,		
	23, 24, 25, 26, 27, 28(d), 29 and 30(c))	15684.81	132810.47
2.	Total Federal Disbursements		
	(subtract Line 21(a)(ii) and Line 30(a)(ii)		
	from Line 31)	15684.81	132810.47

FEC Form 3X (Rev. 05/2016) III. Net Contributions/

Operating Expenditures

33. Total Contributions (other than loans)

(from Line 28(d))..... 35. Net Contributions (other than loans)

36. Total Federal Operating Expenditures

37. Offsets to Operating Expenditures

(from Line 15, page 3)..... 38. Net Operating Expenditures

34. Total Contribution Refunds

of Disbursements

Page 5 COLUMN A COLUMN B **Total This Period** Calendar Year-to-Date 8400.00 55900.00 (from Line 11(d), page 3) ..... 0.00 0.00 8400.00 55900.00 (subtract Line 34 from Line 33) ..... 10884.81 65954.47 (add Line 21(a)(i) and Line 21(b)) ....... 0.00 0.00 10884.81 65954.47 (subtract Line 37 from Line 36) ......

TOTAL This Period (last page this line number only).....

SCHEDULE A (FEC Form 3X) FOR LINE NUMBER: **PAGE** 6 OF Use separate schedule(s) (check only one) ITEMIZED RECEIPTS for each category of the X 11a 11b 11c 12 Detailed Summary Page 13 14 15 16 Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (In Full) Vitoria PAC Full Name of Individual (Last, First, Middle Initial) or Full Organization Name Coelho, Frank, , , Jr. Date of Receipt Mailing Address PO Box 216 2020 10 14 City State Zip Code Transaction ID: A-1294000 CA Five Points 93624 Amount of Each Receipt this Period FEC ID number of contributing C 4200.00 federal political committee. Name of Employer (for Individual) Occupation (for Individual) Memo Item Partner Casaca Vineyards Receipt For: Aggregate Year-to-Date ▼ Primary General 5000.00 Other (specify) \(\nbbeta\) Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Coelho, John, , , Date of Receipt Mailing Address PO Box 216 2020 10 14 City State Zip Code Transaction ID: A-1293999 Five Points CA 93624 Amount of Each Receipt this Period FEC ID number of contributing 4200.00 federal political committee. Memo Item Name of Employer (for Individual) Occupation (for Individual) Casacao Vineyards Partner Receipt For: Aggregate Year-to-Date ▼ Primary General 5000.00 Other (specify) ▼ Full Name of Individual (Last, First, Middle Initial) or Full Organization Name Date of Receipt Mailing Address City State Zip Code Amount of Each Receipt this Period FEC ID number of contributing C federal political committee. Memo Item Name of Employer (for Individual) Occupation (for Individual) Receipt For: Aggregate Year-to-Date ▼ General Primary Other (specify) 8400.00 SUBTOTAL of Receipts This Page (optional).....

8400.00

SCHEDULE B (FEC FOIII 3X)	Llas separate sebadula(s)	FOR LINE NUMBER: PAGE 7 OF 8			
TEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the	(check only one)  x 21b 22 23 26 27			
	Detailed Summary Page 28a				
Any information copied from such Reports and Statem or for commercial purposes, other than using the nam	nents may not be sold or used ne and address of any political	by any person for the purpose of soliciting contributions committee to solicit contributions from such committee.			
NAME OF COMMITTEE (In Full) Vitoria PAC					
Full Name (Last, First, Middle Initial)  A. Kramer & Associates	Date of Disbursement  10 12 2020				
Mailing Address 2201 Francisco Drive Suite 140-183		10 12 2020			
9 (19 (19 (19 (19 (19 (19 (19 (19 (19 (1	ose of Disbursement				
Senate	Candidate Name  Category/ Type  Office Sought: House Disbursement For: Senate Primary General President Other (specify) ▼				
Full Name (Last, First, Middle Initial)  8. Renteria, Andrew, , ,  Mailing Address 2023 Magnolia Ave	Date of Disbursement  M = M / D = D / Y = Y = Y = Y = Y = Y = Y = Y = Y = Y				
5.55	State Zip Code CA 93657	FEC Identification Number  C  Transaction ID : B-1206336			
		Category/ Type  Amount of Each Disbursement this Period  4904.81  Memo Item			
Full Name (Last, First, Middle Initial)  C.  Mailing Address		Date of Disbursement			
City S Purpose of Disbursement	State Zip Code	FEC Identification Number			
Candidate Name	Category/ Type  Amount of Each Disbursement this Period				
Senate	President Other (specify) ▼				
SUBTOTAL of Disbursements This Page (optional)		10684.81			
TOTAL This Period (last page this line number only).		10604.04			

ITEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE 8 OF 8 (check only one)  21b 22 x 23 26 27 28a 28b 28c 29 30b
Any information copied from such Reports and Statem	nents may not be sold or used	by any person for the purpose of soliciting contributions committee to solicit contributions from such committee.
NAME OF COMMITTEE (In Full)  Vitoria PAC	o and address of any pointed	COMMITTEE TO CONTRIBUTIONS FROM COMMITTEE.
Full Name (Last, First, Middle Initial)  Andy Barr for Congress  Mailing Address PO Box 2059		Date of Disbursement  M M M / D D / Y D Y D Y D Y D Y D Y D Y D Y D
Lexington Purpose of Disbursement Contr bution  Candidate Name  Barr, Andy, , ,  Office Sought:  House Disbursem Senate	State Zip Code KY 40588  Thent For: 2020  Primary General  Other (specify)   The code of t	Transaction ID : B-1294002 Amount of Each Disbursement this Period  Memo Item
Full Name (Last, First, Middle Initial)  B. Jerry Carl for Congress  Mailing Address PO Box 852138		Date of Disbursement  M M M / D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Mobile Purpose of Disbursement Contribution  Candidate Name  Carl, Jerry, Lee, , Jr  Office Sought:  House Disbursem Senate		Transaction ID: B-1206355 Amount of Each Disbursement this Period  Memo Item
Full Name (Last, First, Middle Initial)  C.  Mailing Address		Date of Disbursement
City S Purpose of Disbursement	State Zip Code	FEC Identification Number
		Category/ Type  Amount of Each Disbursement this Period  Memo Item
SUBTOTAL of Disbursements This Page (optional)		4800.00
TOTAL This Period (last page this line number only).		4000.00