

THE HEIKKINEN LAW FIRM, P.C.

110 NORTH MICHIGAN AVENUE
HOWELL, MICHIGAN 48843

ARTHUR HEIKKINEN
RICHARD A. HEIKKINEN

(517) 546-1434
FAX (517) 546-6775

March 20, 2000

Lawrence Noble
Office of the General Counsel
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463

Re: MUR 4984

Dear Mr. Noble:

My client, F.H. & L. Development, Inc., who does business as Lake Pointe Manor has received a letter from the Federal Election Commission dated March 13, 2000 from John R. Velasquez, Jr.

It is my understanding that the complaint pertains to alleged violations of the Federal Election Campaign Act by Michael J. Rogers and others. The complaint alleges that illegal corporate contributions were made by Lake Pointe Manor. Apparently the complaint arises out of the "Schedule B" to Mr. Roger's campaign report wherein Lake Pointe Manor was listed as making an inkind contribution in the amount \$5,742.16 on November 13, 1999.

On November 13, 1999 Jerry Spitler Brighton Ford Promotions held a banquet at Lake Pointe Manor in Geona Township. The total cost of the banquet was \$29,667.20. The entire cost of the banquet was paid by checks received from Brighton Ford Mercury, Inc. A deposit in the amount of \$2,000.00 was paid to Lake Pointe Manor on February 17, 1999. A second payment was made in the amount of \$15,600.00 on November 8, 1999. A third payment was made in the amount of \$12,474.60 on November 9, 1999. Because of the total of the payments made exceeded the cost of the banquet, Lake Pointe Manor issued a refund check in the amount of \$407.40 to Brighton Ford Mercury, Inc. on November 15, 1999.

F. H. & L. Development, Inc., d/b/a Lake Pointe Manor did not at any time make donations of any kind to the Rogers for Congress campaign. All costs of the banquet were paid by Brighton Ford Mercury, Inc.

I am enclosing herewith a completed Statement of Designation of Counsel. Also I am enclosing an Affidavit signed by Richard Luce the manager of Lake Pointe Manor.

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

MAR 21 4 19 PM '00

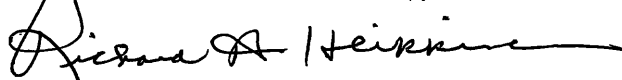
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Lawrence Noble
March 20, 2000
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I expect that after examination of the facts you will agree that my client did not commit a violation of the Federal Election Campaign Act. Please advise me whether or not you will require additional information.

Very truly yours,

THE HEIKKINEN LAW FIRM, P.C.

A handwritten signature in dark ink, appearing to read "Richard A. Heikkinen", written over the printed name.

Richard A. Heikkinen

RAH/nb
Enclosure

21 "04" 399 "4925"

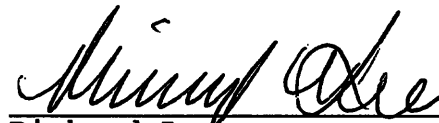
AFFIDAVIT

STATE OF MICHIGAN]
]ss
COUNTY OF LIVINGSTON]

Richard Luce, being first duly sworn, deposes and says as follows:

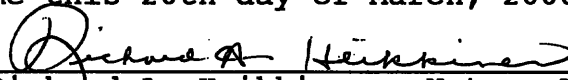
1. Richard Luce was at all times pertinent hereto the manager of Lake Pointe Manor, a banquet facility located in Genoa Township, Livingston County, State of Michigan.
2. F. H. & L. Development, Inc. is a Michigan Corporation doing business under the assumed name of Lake Pointe Manor.
3. On November 13, 1999 Jerry Spitler Brighton Ford Promotions held a banquet at Lake Pointe Manor in Genoa Township. The total cost of the banquet was \$29,667.20. The entire cost of the banquet was paid by checks received from Brighton Ford Mercury, Inc. A deposit in the amount of \$2,000.00 was paid to Lake Pointe Manor on February 17, 1999. A second payment was made in the amount of \$15,600.00 on November 8, 1999. A third payment was made in the amount of \$12,474.60 on November 9, 1999. Because of the total of the payments made exceeded the cost of the banquet, Lake Pointe Manor issued a refund check in the amount of \$407.40 to Brighton Ford Mercury, Inc. on November 15, 1999.
4. Attached to this affidavit are duplicates of the invoice issued to Jerry Spitler Brighton Ford Promotions.
5. Attached to this affidavit are photocopies of the checks referred to in paragraph 3 hereinabove.
6. F. H. & L. Development, Inc., d/b/a Lake Pointe Manor did not at any time make any inkind donations to the Rogers for Congress campaign. All costs of the banquet were paid by Brighton Ford Mercury, Inc.

Further, deponent sayeth not.



Richard Luce

Subscribed and sworn to before
me this 20th day of March, 2000.



Richard A. Heikkinen - Notary Public
Livingston County, Michigan
My commission expires: 10/24/01

21.04.399.4926

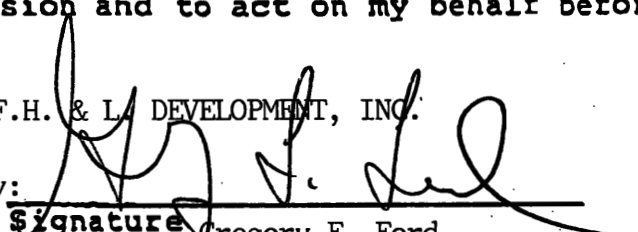
STATEMENT OF DESIGNATION OF COUNSELMUR 4984NAME OF COUNSEL: Richard A. HeikkinenADDRESS: 110 North Michigan Avenue
Howell MI 48843TELEPHONE: (517) 546-1434

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

March 2000
Date

F.H. & L. DEVELOPMENT, INC.

By:


Signature Gregory F. Ford
Its Secretary/TreasurerRESPONDENT'S NAME: F.H. & L. Development, Inc., d/b/a Lake Pointe ManorADDRESS: 5768 E. Grand River
Howell MI 48843

HOME PHONE: _____

BUSINESS PHONE: (517) 545-1000

21.04.399.4927