

**Congressman  
CIRO D.  
RODRIGUEZ**

**Ciro D. Rodriguez for Congress Committee**

P.O. Box 14528, San Antonio, Texas 78214 Phone 210-928-CIRO (2476)

March 4, 2004

Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

MUR # 5422

Dear General Counsel:

I write to lodge a complaint against the Texans for Henry Cuellar Congressional Campaign for failure to comply with federal election law requirements to disclose details regarding a bank loan the committee received.

In its pre-primary report filed on February 26, 2004, the Cuellar campaign reported receipt of a \$200,000 loan from the International Bank of Commerce. The loan was listed as not secured. After we challenged this loan publicly, the Cuellar campaign on the next day filed an amended pre-primary report listing the loan as secured.

The Cuellar campaign failed in both reports to file the required Schedule C-1. Without this schedule, it is impossible to determine whether or not the loan is in fact secured and commercially reasonable. These regulations exist obviously to prevent illegal contributions disguised as sweetheart loans by, among other things, disclosing to the public the nature of the security interest and requiring the bank to certify the loan as valid. The lending bank is located in the candidate's hometown and its executives are actively supporting the Cuellar campaign.

This loan represents more than one-third of the Cuellar campaign's total receipts this cycle. Failure to disclose the required details for a loan of this size in the last weeks of the campaign raises serious concerns.

Thank you for your prompt action on this matter.

Sincerely,

  
Debbie Martinez  
Ciro D. Rodriguez for Congress Committee

[www.CiroDRodriguez.com](http://www.CiroDRodriguez.com)

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AFFIDAVIT

I hereby certify that under penalty of perjury that the foregoing document is true and correct.

  
Debbie Martinez

STATE OF TEXAS

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COUNTY OF BEXAR

Before me the undersigned Notary Public, on this the 4<sup>th</sup> day of March, 2004 personally appeared Debbie Martinez, who being by me duly sworn on her oath deposed and says that she is duly qualified and authorized in all respects to make this Affidavit; that she has read the above and foregoing and that every statement contained herein is within her knowledge true and correct.



  
Notary Public State of Texas

My commission expires: 6-4-2005

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