

J. Ralph Atkin, P.C.

ATTORNEY AT LAW

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St. George, Utah 84790

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2004 OCT 18 P 12:47

October 15, 2004

Mr Mark Allen
Federal Election Commission
Office of General Counsel
999 E Street N W

Re MUR 5333

Dear Mr Allen

As counsel for the Lichfield family and the Robert Browning Lichfield Family Limited Partnership, I am enclosing for your review the affidavits of the parties listed in your Factual and Legal Analysis statement, along with the answered Attachment I am including the signed Statement of Designation of Counsel Copies of birth certificates are also enclosed

It is my client's sincere desire to get this matter resolved as soon as possible I have represented this family for many years and they are concerned about this situation as this was the first time they had made any significant contributions to a federal office and they were simply relying upon advice of the candidate and his legal counsel Whatever error may have been made, was don done so intentionally

I look forward to a speedy resolution of this matter

Sincerely



J Ralph Atkin, Esq

27044165034

STATEMENT OF DESIGNATION OF COUNSELMUR 5333NAME OF COUNSEL: J. RALPH ATKINADDRESS: 1240 East 100 South #10St. George, Utah 84790TELEPHONE NO.: (435) 656-5300

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.

10/14/04
DateRobert B Lichtfeld
SignatureWITNESS' NAME: CHERI ATKIN

ADDRESS:

St. George, Utah 84790

HOME PHONE:

BUSINESS PHONE: (435) 673-7603

27044165035

MUR 5333

The original disbursement came from the Family partnership and its bank account at Wells Fargo Bank, the account number is

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At no time was there ever any conscious intent to violate the federal election laws, but rather my intent was to make an allowable contribution to the candidate of my choice

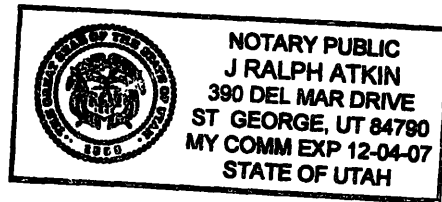
FURTHER AFFIANT SAYETH NOT.

Robert B Lichfield
Robert B Lichfield

Subscribed and sworn before me a Notary Public on the day and year above written

J Ralph Atkin
NOTARY PUBLIC

MY COMMISSION EXPIRES



27044165037

27-00000

STATE OF UTAH)
)
) SS
COUNTY OF WASHINGTON)

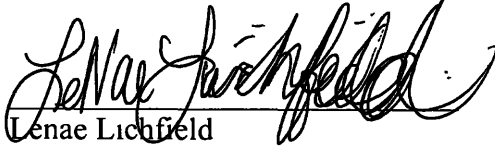
Comes now the above named Affiant and hereby makes the following statement:

I want to state clearly that at no time during the alleged violation (January of 2002) of the Federal Election Laws, did I “knowingly or willingly” violate such laws. I had never before made any contributions to Federal candidates for office and I was simply relying upon the representation of Mr. John Swallow and his staff, candidate for US House of Representatives, as to the amount and manner of making such contributions.

Mr. Swallow and his staff provided us with instructions as to the manner and method of making these payments

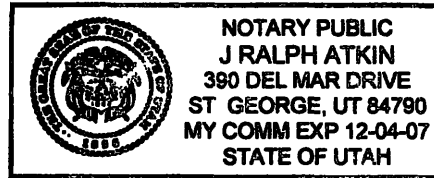
At no time was there ever any conscious intent to violate the federal election laws, but rather my intent was to make an allowable contribution to the candidate of my choice.

FURTHER AFFIANT SAYETH NOT


Lenae Lichfield

Subscribed and sworn before me a Notary Public on the day and year above written


NOTARY PUBLIC



MY COMMISSION EXPIRES

27044165039

FEDERAL ELECTION COMMISSION
AFFIDAVIT

MUR 5333

STATE OF UTAH)
)
COUNTY OF WASHINGTON)

On this 14th day of October, 2004, personally appeared before me Loni Lichfield O'Neil aka Loni Lichfield, who, being duly sworn did make the following statements and stated to me that they are truly to the best of her information, belief and memory, and that she did execute this AFFIDAVIT in my presence

Comes now the above named Affiant and hereby makes the following statement

My name is Loni Lichfield O'Neil and I am a resident of Utah County, Utah I am acquainted with the facts alleged in the Factual and Legal Analysis regarding this MUR 533 received on or about September 18, 2004.

I want to state clearly that at no time during the alleged violation (January of 2002) of the Federal Election Laws, did I "knowingly or willingly" violate such laws I had never before made any contributions to Federal candidates for office and I was simply relying upon the representation of Mr John Swallow and his staff, candidate for US House of Representatives, as to the amount and manner of making such contributions

Further I state that I contributed \$3000 00 of personal funds to the campaign of Mr. Swallow I received these personal funds through a distribution paid from a family business the Robert Browning Lichfield Family Limited Partnership Mr Robert B Lichfield as General Partner made arrangements for the funds to be distributed from the partnership account to be issued for each of the partners and their spouses in the amount of \$3,000 00 each

Mr Swallow and his staff provided us with instructions as to the manner and method of making these payments

27044165040

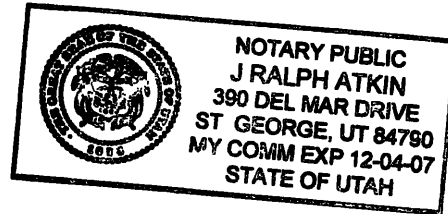
At no time was there ever any conscious intent to violate the federal election laws, but rather my intent was to make an allowable contribution to the candidate of my choice

FURTHER AFFIANT SAYETH NOT


Loni Lichfield O'Neil

Subscribed and sworn before me a Notary Public on the day and year above written


NOTARY PUBLIC



MY COMMISSION EXPIRES.

27044165041

FEDERAL ELECTION COMMISSION
AFFIDAVIT

MUR 5333

STATE OF UTAH)
)
COUNTY OF WASHINGTON)

On this 14th day of October, 2004, personally appeared before me Lyndee Lichfield, who, being duly sworn did make the following statements and stated to me that they are truly to the best of her information, belief and memory, and that she did execute this AFFIDAVIT in my presence

Comes now the above named Affiant and hereby makes the following statement

My name is Lyndee Lichfield and I am a resident of Utah County, Utah I am acquainted with the facts alleged in the Factual and Legal Analysis regarding this MUR 533 received on or about September 18, 2004

I want to state clearly that at no time during the alleged violation (January of 2002) of the Federal Election Laws, did I "knowingly or willingly" violate such laws I had never before made any contributions to Federal candidates for office and I was simply relying upon the representation of Mr John Swallow and his staff, candidate for US House of Representatives, as to the amount and manner of making such contributions

Further I state that I contributed \$3000.00 of personal funds to the campaign of Mr Swallow. I received these personal funds through a distribution paid from a family business the Robert Browning Lichfield Family Limited Partnership Mr Robert B Lichfield as General Partner made arrangements for the funds to be distributed from the partnership account to be issued for each of the partners and their spouses in the amount of \$3,000 00 each

Mr Swallow and his staff provided us with instructions as to the manner and method of making these payments

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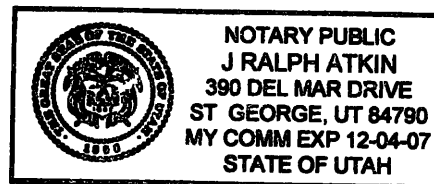
At no time was there ever any conscious intent to violate the federal election laws, but rather my intent was to make an allowable contribution to the candidate of my choice

FURTHER AFFIANT SAYETH NOT


Lyndee Lichfield

Subscribed and sworn before me a Notary Public on the day and year above written


NOTARY PUBLIC



MY COMMISSION EXPIRES

27044165043

FEDERAL ELECTION COMMISSION
AFFIDAVIT

MUR 5333

STATE OF UTAH)
)
)
COUNTY OF WASHINGTON)

On this 14th day of October, 2004, personally appeared before me Patricia Lichfield, who, being duly sworn did make the following statements and stated to me that they are truly to the best of her information, belief and memory, and that she did execute this AFFIDAVIT in my presence

Comes now the above named Affiant and hereby makes the following statement.

My name is Patricia Lichfield and I am a resident of Washington County Utah I am acquainted with the facts alleged in the Factual and Legal Analysis regarding this MUR 533 received on or about September 18, 2004

I want to state clearly that at no time during the alleged violation (January of 2002) of the Federal Election Laws, did I "knowingly or willingly" violate such laws I had never before made any contributions to Federal candidates for office and I was simply relying upon the representation of Mr. John Swallow and his staff, candidate for US House of Representatives, as to the amount and manner of making such contributions

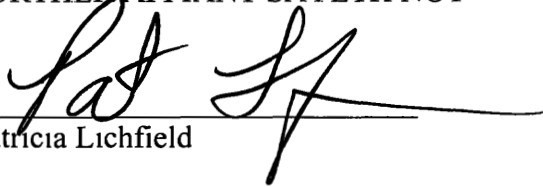
Further I state that I contributed \$3000 00 of personal funds to the campaign of Mr Swallow I received these personal funds through a distribution paid from a family business the Robert Browning Lichfield Family Limited Partnership Mr Robert B Lichfield as General Partner made arrangements for the funds to be distributed from the partnership account to be issued for each of the partners and their spouses in the amount of \$3,000 00 each

Mr Swallow and his staff provided us with instructions as to the manner and method of making these payments

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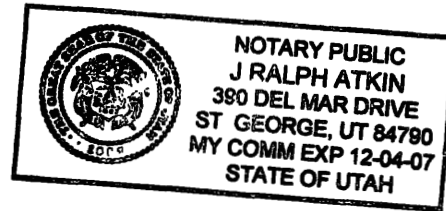
At no time was there ever any conscious intent to violate the federal election laws, but rather my intent was to make an allowable contribution to the candidate of my choice

FURTHER AFFIANT SAYETH NOT


Patricia Lichfield

Subscribed and sworn before me a Notary Public on the day and year above written


NOTARY PUBLIC



MY COMMISSION EXPIRES

27044165045

FEDERAL ELECTION COMMISSION
AFFIDAVIT

MUR 5333

STATE OF UTAH)
)
)
COUNTY OF WASHINGTON)

On this 14th day of October, 2004, personally appeared before me Reagan Lichfield, who, being duly sworn did make the following statements and stated to me that they are truly to the best of his information, belief and memory, and that he did execute this AFFIDAVIT in my presence.

Comes now the above named Affiant and hereby makes the following statement

My name is Reagan Lichfield and I am a resident of Washington County Utah I am acquainted with the facts alleged in the Factual and Legal Analysis regarding this MUR 533 received on or about September 18, 2004

I want to state clearly that at no time during the alleged violation (January of 2002) of the Federal Election Laws, did I "knowingly or willingly" violate such laws I had never before made any contributions to Federal candidates for office and I was simply relying upon the representation of Mr. John Swallow and his staff, candidate for US House of Representatives, as to the amount and manner of making such contributions.

Further I state that I contributed \$3000 00 of personal funds to the campaign of Mr Swallow I received these personal funds through a distribution paid from a family business the Robert Browning Lichfield Family Limited Partnership Mr Robert B Lichfield as General Partner made arrangements for the funds to be distributed from the partnership account to be issued for each of the partners and their spouses in the amount of \$3,000 00 each

Mr Swallow and his staff provided us with instructions as to the manner and method of making these payments.

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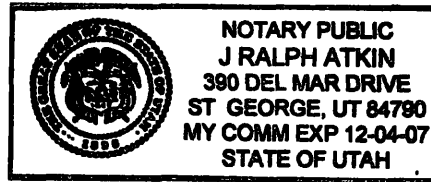
At no time was there ever any conscious intent to violate the federal election laws, but rather my intent was to make an allowable contribution to the candidate of my choice

FURTHER AFFIANT SAYETH NOT

Reagan Lichfield
Reagan Lichfield

Subscribed and sworn before me a Notary Public on the day and year above written

J. Ralph Atkin
NOTARY PUBLIC



MY COMMISSION EXPIRES

27044165047

MUR 5333

Mr Swallow and his staff provided us with instructions as to the manner and method of making these payments

At no time was there ever any conscious intent to violate the federal election laws, but rather my intent was to make an allowable contribution to the candidate of my choice

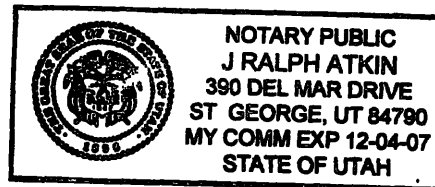
FURTHER AFFIANT SAYETH NOT


Robbie Lichfield

Subscribed and sworn before me a Notary Public on the day and year above written


NOTARY PUBLIC

MY COMMISSION EXPIRES



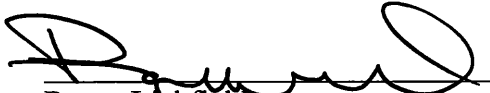
27044155049

MUR 5333


Mr Swallow and his staff provided us with instructions as to the manner and method of making these payments

At no time was there ever any conscious intent to violate the federal election laws, but rather my intent was to make an allowable contribution to the candidate of my choice.

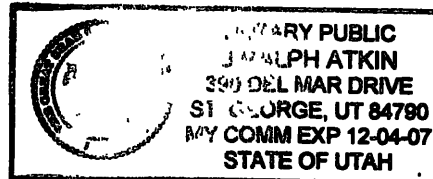
FURTHER AFFIANT SAYETH NOT


Roger Lichfield

Subscribed and sworn before me a Notary Public on the day and year above written


NOTARY PUBLIC

MY COMMISSION EXPIRES



27044185051

250447

STATE OF UTAH)
)
) SS
COUNTY OF WASHINGTON)

Comes now the above named Affiant and hereby makes the following statement

I want to state clearly that at no time during the alleged violation (January of 2002) of the Federal Election Laws, did I “knowingly or willingly” violate such laws. I had never before made any contributions to Federal candidates for office and I was simply relying upon the representation of Mr. John Swallow and his staff, candidate for US House of Representatives, as to the amount and manner of making such contributions.

Mr Swallow and his staff provided us with instructions as to the manner and method of making these payments.

At no time was there ever any conscious intent to violate the federal election laws, but rather my intent was to make an allowable contribution to the candidate of my choice.

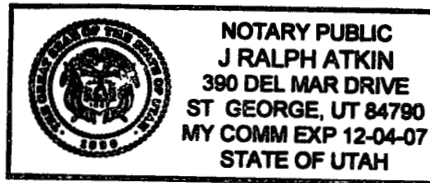
FURTHER AFFIANT SAYETH NOT


Stephanie Lichfield

Subscribed and sworn before me a Notary Public on the day and year above written


NOTARY PUBLIC

MY COMMISSION EXPIRES



27044165053

270454

STATE OF UTAH)
)
) SS
COUNTY OF WASHINGTON)

Comes now the above named Affiant and hereby makes the following statement:

I want to state clearly that at no time during the alleged violation (January of 2002) of the Federal Election Laws, did I “knowingly or willingly” violate such laws. I had never before made any contributions to Federal candidates for office and I was simply relying upon the representation of Mr John Swallow and his staff, candidate for US House of Representatives, as to the amount and manner of making such contributions

Mr Swallow and his staff provided us with instructions as to the manner and method of making these payments

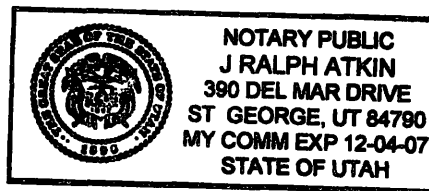
At no time was there ever any conscious intent to violate the federal election laws, but rather my intent was to make an allowable contribution to the candidate of my choice.

FURTHER AFFIANT SAYETH NOT


Tavia Lichfield

Subscribed and sworn before me a Notary Public on the day and year above written


NOTARY PUBLIC



MY COMMISSION EXPIRES

27044165055