

ALEJANDRO O. CAMPILLO
 A Professional Law Corporation
 405 East Lexington Avenue, Suite 200
 El Cajon, California 92020
 Tel: (619) 234-3994

OFFICE OF
 GENERAL COUNSEL

alex@campillolaw.com

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Alejandro O. Campillo
 Attorney at Law

January 7, 2020

MUR 7673

Jeff S. Jordan
 Assistant General Counsel
 Complaints Examination & Legal Administration
 Federal Election Commission
 Attn: Christal Dennis, Paralegal
 1050 First Street, NE
 Washington, DC 20463

RESPONSE

Dear Mr. Jordan:

This is to respond to your letter of December 26, 2019.

Your letter is directed to Denny's Inc., Alexandro Campillo, 110 W Cole Road, Calexico, CA 92231.

I note that the complaint that is the subject of your inquiry refers to "Alejandro Campillo", which is my correct name. In addition, I am the father of Raul A. Campillo, a candidate for San Diego City Council District 7. I respond in my personal capacity as Alejandro O. Campillo, and on behalf of Campillo Food Services, Inc., the California corporation owned by my father, Alexander O. Campillo, and by myself, Alejandro O. Campillo. We are the owners of Denny's Restaurant Franchise Number 6403, located in Calexico, California, and operate the business through our corporation, Campillo Food Services, Inc. My father and I were granted the franchise 25 years ago, built the building, and have operated the business successfully to date. Our business is generally referred to as the "Calexico Denny's".

Your letter is directed to "Denny's, Inc." I do not purport to respond on behalf of "Denny, Inc." I assume your reference is to the parent company, or the franchisor of Denny's Restaurant franchises, as noted in your service notice. The Denny's parent corporation does not own or operate my franchise restaurant.

I have been a licensed attorney in the State of California since 1981. Since 1992 to the present I have also been Certified as a Specialist in the field of Immigration and Nationality Law by the Board of Legal Specialization, State Bar of California.

The complaint draws two incorrect conclusions from sketchy information admittedly obtained from social media sites. First, the complainant states that it does not appear that Mr. Joel Delgado has a "green card", and concludes that he is not lawfully admitted for permanent residence. This is incorrect.

In fact, Mr. Delgado does have a green card, and has been lawfully admitted for permanent residence since 1991. A copy of his lawful permanent resident card is attached for your review. Mr. Delgado is in fact lawfully authorized to be employed in the United States, and has been since 1991. Mr. Delgado also has a California driver license and a U.S. Social Security Card. Mr. Delgado is lawfully employed in the United States by Campillo Food Services, Inc. His position is that of General Manager of the restaurant. I have also attached affidavits from Mr. Joel Delgado, in English and in Spanish, and from Ms. Sonia Robles, our company's comptroller, who manages our payroll records, bank accounts, and financial records. Both attest that Mr. Delgado has not received any reimbursement for his contributions to my son's campaign.

The fact that Mr. Delgado has a residence in Mexicali, Baja California, Mexico is of no significance, and does not effect his lawful permanent residence status or authorization to be employed in the United States. The fact is that many thousands of U.S. lawful permanent residents reside in Mexicali, Baja California, Mexico and commute to work in the Imperial Valley daily. I believe the number may in fact exceed 20,000 that commute daily.

The complaint also states that the fact that Mr. Delgado has made a contribution to my son's political campaign raises a question of whether there was any improper reimbursement by Denny's or by Raul Campillo to Mr. Delgado for his campaign contributions. Mr. Delgado has not received any improper reimbursement by Denny's, by Campillo Food Services, Inc., by me, by my son, Raul, or by anyone. Furthermore, I don't see why Mr. Delgado's contributions necessarily or automatically raises any question as to whether there was any improper reimbursement.

I earned my Bachelor's Degree in Political Science at Stanford University. I earned my Juris Doctor degree from the University of San Diego, School of Law. I have been a successful attorney for 38 years, with an unblemished record. In 1992 I was one of the original group of 33 attorneys awarded a certificate as a Certified Specialist in Immigration and Nationality Law in the State of California, which I believe now numbers only 200. The vetting process for this certificate includes professional reputation and a record of exemplary practice and professionalism. I have been selected among San Diego's top immigration lawyers for many years by many organizations and publications, including San Diego SuperLawyers Magazine.

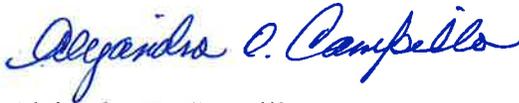
I have also developed and managed the Calexico Denny's for the past 25 years, with an excellent record for professional management that has earned us a solid placement among the top Denny's franchises nationally. In the process, I've created many jobs in an area of exceedingly high unemployment, and have paid real estate taxes, sales taxes, payroll taxes, and income taxes for the past 25 years, without incident. I do not believe that anything about me or my business should so easily raise a question as to whether any improper reimbursement has been made. Basic honest research and inquiry would have quickly found that Mr. Delgado is in fact a lawful permanent resident of the United States, and once that was established, there is no legitimate reason to "raise a question" as to improper reimbursement.

I would suggest that the complaint in question was improperly researched and draws unsubstantiated conclusions, and finishes with a slanderous aspersion. I see an attempt at a political smear, and question the source, the motivation, and the possible conspiracy to damage the professional reputations of my son and of myself, and to damage my son's political campaign.

My son received his Bachelor's Degree from Harvard University, with Honors. He also received his Juris Doctor degree from the Harvard Law School. He has held prestigious positions requiring utmost professionalism and honesty, in Hillary Clinton's national campaign headquarters in Brooklyn, New York, and in one of America's finest and most prestigious national law firms, O'Melveny and Myers. He now holds an important position in the San Diego's City Attorneys Office, Criminal Division. Numerous positions in my son's career have required in depth background checks, particularly to become a prosecutor for the City of San Diego, and none of the background checks have ever raised a flag. It is not in his nature to engage in any improper behavior or activity, as his consistent professional record shows. I can only conclude that this complaint is designed to impugn his character and damage his political campaign.

I respectfully request that you dismiss this complaint.

Respectfully,

A handwritten signature in blue ink that reads "Alejandro O. Campillo". The signature is written in a cursive, flowing style.

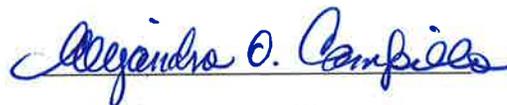
Alejandro O. Campillo
Attorney at Law

AFFIDAVIT

I, Alejandro O. Campillo, declare:

1. I am the father of Raul Campillo, a candidate for San Diego City Council.
2. I have been a licensed attorney by the State Bar of California since 1981, and I have been a certified specialist in Immigration and Nationality Law since 1992.
3. I am also an owner of Campillo Food Services, Inc., a California corporation that operates the Denny's restaurant as a franchise in Calexico, California. The only other owner is my father, Alexander O. Campillo. The Denny's corporate organization does not own or operate the restaurant.
4. I have known Joel Delgado for well over a decade, as he has been my employee at the Denny's.
5. In about May 2019, I informed Mr. Delgado that my son Raul was running for office. I showed Mr. Delgado some campaign materials I had with me. I did not know that Mr. Delgado would decide to contribute as we did not discuss it much. Several weeks later, Mr. Delgado told me that he had made a contribution.
6. I did not, at any time, order or instruct Mr. Delgado or any other person to contribute to Raul's campaign.
7. I have not, at any time, promised Mr. Delgado or any other person that I would reimburse him or her for his or her contribution to Raul's campaign.
8. I have not reimbursed Mr. Delgado or anyone else for their contribution to Raul's campaign, through my own funds or by corporate funds of any business that I own.
9. Until it came to my attention in December 2019 that a complaint was filed alleging that there was a potentially unlawful reimbursement for a contribution made by Mr. Delgado, I did not know that Mr. Delgado had contributed to the campaign on a recurring basis, nor did I know the amount Mr. Delgado contributed to Raul's campaign.

Signed under penalty of perjury on this 6 day of January, 2020, in the County of San Diego, State of California.



Alejandro O. Campillo

My name is Sonia Robles, and I declare the following under penalty of perjury to be true and correct, to the best of my knowledge and belief.

I am an employee of Campillo Food Services, Inc., the owner of Denny's Restaurant franchise number 6403, located in Calexico, California. The two owners of Campillo Food Services, Inc. are Mr. Alejandro O. Campillo and his father, Mr. Alexander O. Campillo. My position is Controller, a position I have held for many years. My duties include managing the payroll and the checking account, and serving as the contact person with our corporate certified public accountant and payroll service. I oversee all financial matters for the company.

Mr. Joel Delgado Alvarez informed me that he has contributed to the political campaign of Mr. Raul A. Campillo, who is the son of Mr. Alejandro O. Campillo.

I can attest that Mr. Joel Delgado Alvarez has not received any form of reimbursement or compensation from Campillo Food Services, Inc. for his contribution to Raul Campillo's campaign. I am responsible for overseeing the submission of the payroll information to our payroll service, and I am responsible for managing the sole bank account, and I can confirm that Mr. Joel Delgado Alvarez has not received any form of compensation from our company, other than his standard salary and the standard Christmas bonus which has been paid annually for many years to each member of the managerial staff.

Jan-3rd 2020
Date:


Sonia Robles 01-3-2020

I am Joel Delgado Alvarez and I swear the following is true:

My U.S. immigration status is that of a lawful permanent resident. I have had a "green card" since 1991. I reside in Mexicali, Baja California, Mexico, and I work in Calexico, California, just across the border from Mexicali. I have family that lives in El Centro, California, just north of Calexico.

I am an employee of Campillo Food Services, Inc., which is the operator of the Denny's franchise in Calexico, California. I have been the General Manager at the Denny's in Calexico, California, for many years. Mr. Alejandro Campillo is one of my employers. He owns Campillo Food Services with his father. This past summer, Mr. Campillo showed me some materials about his son's campaign. I have known Raul for a long time, when he would visit the Denny's with his father.

Mr. Campillo never told me to contribute to Raul's campaign. No one told me to contribute anything. I wanted to help Raul's campaign. No one promised me that I would be paid more or reimbursed if I made a contribution to Raul's campaign. I used my own money and my own credit card.

I went to Raul's website on my own and contributed using my own money. I set it to a recurring donation. It contributes automatically every month. When I made the contribution, Raul's website required an address, so I used an address where I have a mailbox. The business is called Barron's and is located at 404 East 2nd Street, in Calexico, California.

I did not think much about the contribution until last month. Mr. Campillo called me and asked me how much I had contributed. I was not sure because it was a recurring contribution. Mr. Campillo asked what the address 404 East 2nd Street was when I made my contribution, and I explained to Mr. Campillo that the address I put was just a mailbox I use because it is on the way home to Mexicali from the Denny's. I also explained that I have family in El Centro, and I use that address on my driver's license. Mr. Campillo said that his son was requesting a photo of my green card, so I took a picture of the green card and my driver's license with the El Centro address as well.

I swear under penalty of perjury that everything typed above is true and accurate to the best of my memory.


Joel Delgado Alvarez

1-3-2020

Date

Me llamo Joel Delgado Alvarez y juro que lo siguiente es cierto:

Mi estado migratorio en los Estados Unidos es el de un residente permanente legal. He tenido una "tarjeta verde" desde 1991. Resido en Mexicali, Baja California, México, y trabajo en Calexico, California, al otro lado de la frontera con Mexicali. Tengo una familia que vive en El Centro, California, un poco al norte de Calexico. He sido Gerente General en Denny's en Calexico, California, durante muchos años.

Soy un empleado de Campillo Food Services, Inc., que es el operador de la franquicia de Denny's en Calexico, California. El Sr. Alejandro Campillo es uno de mis empleadores. Es dueño del Campillo Food Services con su padre. El verano pasado, el Sr. Campillo me mostró algunos materiales sobre la campaña de su hijo. Conozco a Raúl desde hace mucho tiempo, cuando visitaba el Denny's con su padre.

El Sr. Campillo nunca me dijo que contribuyera a la campaña de Raúl. Nadie me dijo que contribuyera nada. Quería ayudar a la campaña de Raúl. Nadie me prometió que me pagarían más o me reembolsarían si hacía una contribución a la campaña de Raúl. Usé mi propio dinero y mi propia tarjeta de crédito.

Fui al sitio web de Raúl por mi cuenta y contribuí con mi propio dinero. Lo puse en una donación recurrente. Contribuye automáticamente cada mes. Cuando hice la contribución, el sitio web de Raúl requería una dirección, por lo que utilicé una dirección donde tengo un buzón. El negocio se llama Barron's y está ubicado en 404 East 2nd Street, en Calexico, California.

No pensé mucho en la contribución hasta el mes pasado. El Sr. Campillo me llamó y me preguntó cuánto había contribuido. No estaba seguro porque era una contribución recurrente. El Sr. Campillo preguntó cuál era la dirección 404 East 2nd Street cuando hice mi contribución, y le expliqué al Sr. Campillo que la dirección que puse era solo un buzón que uso porque está camino a casa de Mexicali desde Denny's. También le expliqué que tengo familia en El Centro, y uso esa dirección en mi licencia de conducir. El Sr. Campillo dijo que su hijo estaba solicitando una foto de mi tarjeta verde, así que tomé una foto de la tarjeta verde y mi licencia de conducir con la dirección de El Centro también.

Juro bajo pena de perjurio que todo lo que escribí anteriormente es verdadero y exacto a lo mejor de mi memoria.



Joel Delgado Alvarez

1-3-2020

Fecha