



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE END OF TMR # 1181

Date Filmed 7-24-81 Camera No. --- 2

Cameraman GPC

3 1 0 1 0 1 3 2 3 5 5

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Proger *MURKIN*

Form 3811, Jan. 1979

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

- Show to whom and date delivered.....
- Show to whom, date and address of delivery.....
- RESTRICTED DELIVERY
Show to whom and date delivered.....
- RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Silda Julia

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>43P263</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Ismael Feliciano

4. DATE OF DELIVERY: *JUN 9 1981* POSTMARK: *JUN 9 1981*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 1, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Gilda Julia
P. O. Box 11605
Santurce, P.R. 00910

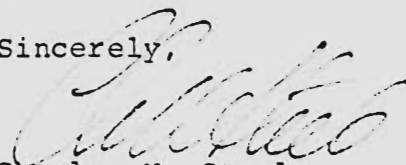
RE: MUR 1181

Dear Mrs. Julia:

As you requested in your letter dated August 19, 1980,
enclosed please find original copies of the corporate checks
issued to Comite Capana George Bush.

Thank you for your cooperation.

Sincerely,


Charles N. Steele
General Counsel

Enclosures

12 check copies

8171013333

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Gilda Julia
P. O. Box 11605
Santurce, P.R. 00910

RE: MUR 1181

Dear Mrs. Julia:

As you requested in your letter dated August 19, 1980,
enclosed please find original copies of the corporate checks
issued to Comite Capana George Bush.

Thank you for your cooperation.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

12 check copies

RIBogin:ano 5/29/81
KAGross

3 1 PUERTO NUEVO DISTRIBUTION CENTER, INC.

P.O. BOX 11605
SANTURCE, PUERTO RICO 00910

Nº 2225

101-204
215

September 6, 79

COMITE CAPATA GEORGE WASH

500.00**

CITIBANK 

Citibank, N.A.

Hato Rey, P. R. 00918

PUERTO NUEVO DISTRIBUTION CENTER, INC.

COPY NOT NEGOTIABLE

George Wash

⑆021502040⑆ 0483788⑈

PUERTO NUEVO DISTRIBUTION CENTER, INC.

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

2488

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

_____ 19 71

PAY THE AMOUNT OF _____ \$ _____
TO THE ORDER OF _____

[
[
L

PUERTO NUEVO DEVELOPMENT CORP.

[Signature]

AUTHORIZED SIGNATURE

COPY - NOT NEGOTIABLE

AUTHORIZED SIGNATURE

⑆0215⑆⑆0204⑆ 0478237⑆

DETACH BEFORE DEPOSITING

VOUCHER

DESCRIPTION	DATE	AMOUNT	DISCOUNT	BALANCE

IN FULL PAYMENT OF ABOVE INVOICES

3 1 7

LEASING & BROKERAGE, INC.

APAR PADO-11608 SANTURCE 00910

520

101 204
215

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

_____ 19 _____

BY THE AMOUNT OF _____
TO THE ORDER OF:

\$ _____

┌

└

Leasing & Brokerage, Inc.

AUTHORIZED SIGNATURE

┌

└

AUTHORIZED SIGNATURE

⑆0215⑆⑆0204⑆ 0240680⑈

DETACH BEFORE DEPOSITING

VOUCHER

DESCRIPTION	DATE	AMOUNT	DISCOUNT	BALANCE

IN FULL PAYMENT OF ABOVE INVOICES

CITY ENTERPRISES, INC. 3 7 3

P. O. Box 11605

SANTURCE, PUERTO RICO 00910

101-204
215

Nº 223

DATE September 6, 1979

PAY TO THE ORDER OF COMITE CAPANA GEORGE BUSH

\$ 500.00**

DOLLARS

CITY ENTERPRISES, INC.

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

NON NEGOTIABLE

⑆0215⑆0204⑆ 0478946⑆

CITY ENTERPRISES, INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING:

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

3 1 0 1 0 3 3 7 1
INDUSTRIAL WAREHOUSE INC.
 P. O. BOX 11605
 SANTURCE, PUERTO RICO

101-204
 215

No 990

DATE September 6, 1979

PAY _____ DOLLARS \$ 500.00**
 TO THE ORDER OF _____

OTTE CAPASA GEORGE BELGI

INDUSTRIAL WAREHOUSES INC.

Paul Capasa

NON NEGOTIABLE

FIRST NATIONAL CITY BANK
 SANTURCE, PUERTO RICO

⑆0215⑉0204⑆ 0214775⑈

INDUSTRIAL WAREHOUSES INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING:

PERIOD ENDING	HOURS			EARNINGS				DEDUCTIONS					NET PAY	
	REG	O.T.	TOTAL	REGULAR	OVERTIME	OTHER	TOTAL	F.I.C.A.	WITHHOLD- ING TAX	STATE TAX	INS			

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

31710

CASTLE ENTERPRISES, INC.

P. O. BOX 11605
SANTURCE, P.R. 00910

No 123

101-202
215

September 6, 79

CASTLE CANADA (CORPORATE)

500.00**



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

COPY NOT NEGOTIABLE

[Handwritten signature]

[Handwritten signature]

⑆0215⑉0202⑆ 859⑉1145762⑈

CASTLE ENTERPRISES, INC.

DATE	DESCRIPTION	AMOUNT

[Handwritten mark]

3 1 7

SAN JUAN REALTY, CORP.

P. O. BOX 11605
SANTURCE, P.R. 00910

No 168

101-202
215

September 6, 79

COMITE CAMPAÑA GEORGE BUSH

500.00**

COPY NOT NEGOTIABLE



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

George Bush

⑆0215⑆⑆0202⑆ 859⑆1737014⑆

SAN JUAN REALTY CORP.

DATE	DESCRIPTION	AMOUNT

3 1 GIRAFA INC. 3 1 3 7 7

P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-204
215

Nº 553

DATE September 6, 1979

PAY TO THE ORDER OF COMITE CAPANA GEORGE BUSH

\$ 500.00**

DOLLARS

GIRAFA, INC.

NON - NEGOTIABLE

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

⑆0215⑆0204⑆0478938⑆

GIRAFA, INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

3 1 1 0 0 0 0 0 3 2 3
TRIPLE A INVESTMENTS, INC.

P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

107-204
215

133

2

DATE September 6, 1979

PAY _____ DOLLARS \$ 500.00**
TO THE ORDER OF _____

CONTE CAPANA GEORGE BUSSI

TRIPLE A INVESTMENTS, INC.

W. A. Young

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

NON NEGOTIABLE

TRIPLE A INVESTMENTS, INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING

PERIOD ENDING	HOURS			EARNINGS				DEDUCTIONS					
	REG.	O.T.	TOTAL	REGULAR	OVERTIME	OTHER	TOTAL	F.I.C.A.	WITHHOLD- ING TAX	STATE TAX	INS.		NET PAY

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

3 1 7 1 0

GATEWAY PLAZA, INC.

P.O. BOX 11605
SANTURCE, P.R. 00910

NO

1501

101-204
215

September 6,

79

COMITE CAMPAÑA GEORGE BUSH

500.00**

CITIBANK+

Citibank, N.A.

Hato Rey, P.R. 00918

COPY NOT NEGOTIABLE

[Handwritten signature]
[Handwritten signature]

⑆0215⑆0204⑆ 0492086⑆

GATEWAY PLAZA, INC.

DATE	DESCRIPTION	AMOUNT

ALMAC ENTERPRISES, INC. 3 3 1

P. O. BOX 11605

SANTURCE, PUERTO RICO 00910

101:204
215

001642

DATE September 6, 1979

PAY TO THE ORDER OF COMITE CAPANA GEORGE BUSH \$ 500.00**
DOLLARS

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

ALMAC ENTERPRISES, INC.

George Bush
NON-NEGOTIABLE

ALMAC ENTERPRISES, INC.

PLEASE DETACH BEFORE DEPOSITING BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

SILVER, INC. 1 7 1 0 ! 3 2 3 3 1
 P.O. BOX 11605
 SANTURCE, P.R. 00910

VOUCHER NO. 53508

VOUCHER	REF NUMBER	INVOICE DATE	VENDOR NUMBER	INVOICE AMOUNT	DISCOUNT	AMOUNT PAID
TOTAL ▶						

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED ABOVE

SILVER, INC.
 P.O. BOX 11605
 SANTURCE, P.R. 00910

101-204
 215

CHECK NO. 53508

DATE OF CHECK
 9-06-79

DOLLARS AND CENTS
 EXACTLY \$500.00/100th

PAY ONLY THIS AMOUNT
 \$ 500.00**

PAY TO THE ORDER OF

COMITE CAPASA GEORGE BISH

SILVER, INC.

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

FIRST NATIONAL CITY BANK
 HATO REY, PUERTO RICO

VENDOR FILE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 22, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles S. Fax, Esquire
Chapman, Duff and Paul
1730 Pennsylvania Ave., N.W.
Washington, D.C. 20006

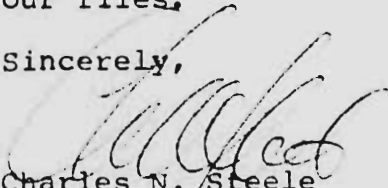
RE: MUR 1181

Dear Mr. Fax:

On May 20, 1981, the Commission accepted the conciliation agreement signed by your client and a civil penalty in settlement of a violation of 2 U.S.C. § 441b and § 441f, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,


Charles N. Steele
General Counsel

cc: Rafael Geigel-Vassallo

Enclosure
Conciliation Agreement

3
1
0
1
0
1
3
1
3
3
0

31101012133

70000 1181 - Bogie

PS Form 3811, Jan 1979

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

Show to whom and date delivered.....€

Show to whom, date and address of delivery.....€

RESTRICTED DELIVERY

Show to whom and date delivered.....€

RESTRICTED DELIVERY.

Show to whom, date, and address of delivery. S. _____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Rafael Kozel-Vanillo

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>052854</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Mirian Lopez

4. DATE OF DELIVERY

5/20/81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

★GPO : 1979-286-848

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

70000 1181 - Bogie

PS Form 3811, Jan 1979

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

Show to whom and date delivered.....€

Show to whom, date and address of delivery.....€

RESTRICTED DELIVERY

Show to whom and date delivered.....€

RESTRICTED DELIVERY.

Show to whom, date, and address of delivery. S. _____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Charles S. Fox

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>152854</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Judna Jones

4. DATE OF DELIVERY

MAY 26 1981

5. ADDRESS (Complete only if requested)

01:11:10 81 MAY 28 11:10

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

★GPO : 1979-286-848

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

5/22/81

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles S. Fax, Esquire
Chapman, Duif and Paul
1730 Pennsylvania Ave., N.W.
Washington, D.C. 20006

RE: MUR 1181

Dear Mr. Fax:

On _____, 1981, the Commission accepted the conciliation agreement signed by your client and a civil penalty in settlement of a violation of 2 U.S.C. § 441b and § 441i, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

cc: Rafael Ceigel-Vassallo

Enclosure
Conciliation Agreement

RIBogin:ano 5/12/81
KAGross

RIB
5/21/81

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 1181 (80)
Julita Rivera de Vincenti)	

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that Julita Rivera de Vincenti violated 2 U.S.C. § 441b and § 441f by receiving, on behalf of a local campaign committee, corporate contributions in connection with a federal election and by knowingly accepting a contribution, on behalf of said committee, made by one person in the name of another person;

NOW, THEREFORE, the Commission and Julita Rivera de Vincenti having duly participated in informal methods of conciliation, do hereby agree as follows:

- I. The Commission has jurisdiction over respondent and the subject matter of this proceeding, and this Agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

310103333

III. Respondent enters voluntarily into this Agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

A. Respondent Julita Rivera de Vincenti serves as Administrator of the State Insurance Fund for the Commonwealth of Puerto Rico.

B. Citizens of the Commonwealth of Puerto Rico do not participate in the U.S. presidential election. Nor, until the 1979-1980 presidential campaign, had citizens of the Commonwealth participated in presidential primaries. In 1980, for the first time, presidential preference primaries were held in Puerto Rico by the major parties.

During the time of the activity involved herein, respondent was chairman of the Bush for President Committee (Committee) in Puerto Rico, which worked on his behalf during the primary campaign.

C. Puerto Rican law permits corporate contributions to Commonwealth-wide political campaigns.

D. In September, 1979, the Committee sponsored a cocktail party for George Bush in order to raise funds by selling tickets to the party.

3174020336

- E. Several corporate checks were received by the Committee. These checks were returned to their makers after the Committee was advised that Federal law prohibited the making or receipt of corporate contributions.
- F. At a subsequent meeting of the Committee, it was suggested that another committee be created that would be able to accept corporate contributions. This committee, named Ciudadanos Pro Democracia (CPD), solicited corporate funds from corporations including those corporations whose previous checks had been returned.
- G. Some of the corporate contributions from CPD were accepted by respondent on behalf of the committee (CPD) and subsequently forwarded to the national headquarters of the George Bush for President Committee in the names of individuals in the form of money orders and personal checks. This activity totalled \$6,500. These monies were subsequently returned to the corporations.
- H. An additional \$2,300 in corporate monies was received by the respondent on behalf of the CPD and used in connection with

3100131337

the Bush campaign. These monies were subsequently returned to the corporations.

I. Respondent has been exceedingly cooperative and forthcoming in the Commission's investigation.

WHEREFORE, Respondent agrees that:

V. 2 U.S.C. § 441b makes it unlawful for any corporation to make a contribution or expenditure in connection with any election, or for any person knowingly to accept or receive any contributions prohibited by 2 U.S.C. § 441b. Since respondent, acting on behalf of the CPD, received corporate monies and these funds were used to make contributions in connection with a Presidential primary election, respondent is in violation of 2 U.S.C. § 441b.

VI. 2 U.S.C. § 441f prohibits a person from knowingly accepting a contribution made by one person in the name of another person. Since respondent, acting on behalf of the CPD, accepted contributions which she knew were made by corporations in the name of individuals, respondent violated 2 U.S.C. § 441f.

VII. Julita Rivera de Vincenti will pay a civil penalty of \$2,200 to the United States Treasury pursuant to 2 U.S.C. § 437g(a)(5)(A).


VIII. Respondent agrees that she shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

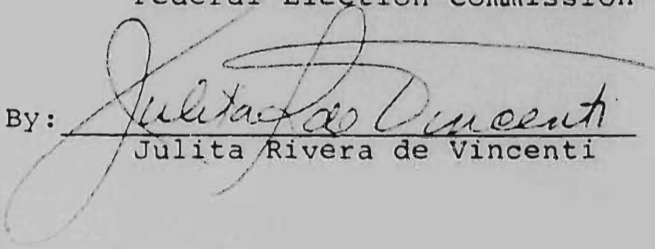
- IX. The Commission, upon request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
- X. It is further agreed that the Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement, unless violated, shall constitute a complete bar to any further action by the Commission with regard to the matters set forth in this Agreement.
- XI. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.
- XII. It is agreed that respondent shall have no more than thirty (30) days from the date this Agreement becomes effective to comply with

and implement the requirement contained in
this Agreement and to so notify the Commission.

20 May 1981
Date

By: 
Charles N. Steele
General Counsel
Federal Election Commission

August 7, 1980
Date

By: 
Julita Rivera de Vincenti

0000000000000000

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Julita Rivera de Vincenti) MUR 1181

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 20, 1981, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1181:

1. Authorize the General Counsel to enter into the agreement as proposed by respondent.
2. Notify respondent.
3. Close the file.

Commissioner Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter.

Attest:

5/20/81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour vote basis:

5-18-81, 10:21
5-18-81, 4:00

311012301

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 1981

81 MAY 18 AIO: 21

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: MUR 1181 - Conciliation Agreement

Circulation of this agreement for Commission approval was delayed pending further investigation into whether there was evidence to support a finding that the violations were knowing and willful. At issue was whether the payee line on twelve corporate contributions made by Gilda Julia and her husband Raul Slavin were altered and if they were, by whom. As previously reported to the Commission, on August 25, 1980 this Office received a letter from Gilda Julia (Attachment "B"), the president of twelve of the corporations that allegedly contributed to Ciudadanos Pro Democracia. This letter was in response to a letter from this Office (Attachment "C") which inquired as to the identity of the recipient of the corporate contributions. Mrs. Julia responded that the intended recipient of her contributions was the George Eush Committee, and she enclosed copies of the checks she had contributed which

revealed that the payee of these checks was the George Bush for President Committee. This Office sent another letter (Attachment "D") to Ms. Julia asking her to forward the original cancelled checks representing the contributions in question. In a letter dated September 22, 1980, Ms. Julia informed this Office that the cancelled checks in issue are not now in her possession and are probably lost. (Attachment "E").

On November 21, 1980, this Office sent respondent's counsel a letter requesting a sworn statement concerning respondent's knowledge of contributions made by corporations owned by Gilda Julia.

In a letter dated January 12, 1981, counsel for Julita Rivera de Vincenti forwarded his client's affidavit to this Office (Attachment "F"). In her affidavit, respondent asserts that she is personally unaware of any alterations to the checks at issue in this matter.

In a sworn statement dated April 28, 1981, Raul Slavin, husband of Gilda Julia, acknowledges that an individual employed by Mr. Slavin and his wife was responsible for altering the payee line on the corporate checks to Ciudadanos Pro Democracia. (Attachment "G"). Accordingly, there is no evidence demonstrating a knowing and willful violation by the respondent. Therefore, the investigation of this matter is complete.

Recommendation

1. Authorize the General Counsel to enter into the agreement as proposed by respondent.
2. Notify respondent.
3. Close the file.

Attachments

Letter to Counsel

Conciliation Agreement

- A - Letter from Charles Fax dated 8/12/80
- B - Letter from Gilda Julia dated 8/25/80
- C - Letter from OGC dated 6/11/80
- D - Letter from OGC dated 9/9/80
- E - Letter from Gilda Julia dated 9/22/80
- F - Letter from respondent dated 1/12/81
- G - Letter from Raul Slavin dated 4/28/81

3171013333

"A"

2/3

pg 1 of 13

1181

RECEIVED

GILDA JULIA
P. O. Box 11605
SANTURCE, P. R. 00910

80 AUG 25 P12:46

August 19, 1980

Mr. Charles N. Steele
General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20465

Dear Mr. Steele:

I acknowledge receipt of your letter dated June 11, 1980. However, I was away all Summer and did not have access to my files until I returned to Puerto Rico on the 9th. of August.

Enclosed please find the original copies of the checks which were issued to Comité Campaña George Bush.

I have no idea why the photocopies which you have enclosed seem to have been issued to Ciudadanos Pro Democracia.

Please return my original copies as soon as you have completed your examination.

Very truly yours,

Gilda Julia
Gilda Julia

mm

Enclosures

CERTIFIED WITH RETURN
RECEIPT REQUESTED # P27 5254778

80 : 8 - 82887 D

B

104013301

"B" pg 1 of 7



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20543

June 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gilda Julia
P. O. Box 11605
Sanurce, Puerto Rico 00910

RE: MUR 1181

Dear Ms. Julia:

The Commission is in receipt of your April 30, 1980, letter wherein you respond to the questions enclosed in the Commission's letter of April 21, 1980. A review of your response raises an additional question that the Commission needs answered to complete its investigation.

Enclosed please find photocopies of twelve corporate checks issued to "Cuidadanos Pro Democracia". In your April 30, 1980 letter, you state that "no contributions were made to "Cuidadanos Pro Democracia," yet, as you can see from the photocopies, checks apparently signed by you were issued to Cuidadanos Pro Democracia. Would you please explain this apparent discrepancy?

If you have any questions concerning this matter, please contact Robert Bogin at (202) 523-4529. Thank you for your cooperation.

Sincerely,

Charles W. Steele
General Counsel

Enclosure

31710232375

C



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 9, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gilda Julia
P. O. Box 11605
Santurce, P.R. 00910

RE: MUR 1181

Dear Ms. Julia:

We are in receipt of your letter dated August 19, 1980, responding to the Commission's letter of June 11, 1980 wherein you enclosed original copies of checks which were issued to Comite Campana George Bush. The Commission appreciates you sending this information to its attention, nonetheless questions continue to arise concerning these contributions. In this regard, the Commission requests that you send the original cancelled checks which correspond to the copies of the checks which you enclosed in your letter of August 19, 1980. Specifically, the Commission requests that you send the following cancelled checks:

- Gateway Plaza, Inc. - No. 1501
- Puerto Nuevo Development Corp. - No. 2488
- Triple A Investments, Inc. - No. 2
- Puerto Nuevo Distribution Center, Inc. - No. 2225
- Almac Enterprises, Inc. - No. 001642
- City Enterprises, Inc. - No. 223
- Leasing and Brokerage, Inc. - No. 520
- Silver, Inc. - No. 53508
- Girafa, Inc. - No. 553
- San Juan Realty Corp. - No. 168
- Industrial Warehouse Inc. - No. 990
- Castle Enterprises, Inc. - No. 123

If you have any questions about this matter please telephone Robert Bogin at (202) 523-4000. Thank you for your cooperation.

Sincerely,

Charles S. Steele
General Counsel

D

31010132375

MUR 1181

Bejon

"D"

PS 1-8

80 OCT 7 11:20

GILDA JULIA
P. O. Box 11605
SANTURCE, P. R. 00910

September 22, 1980

Mr. Charles N. Steele
General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

Dear Mr. Steele:

On May 10, 1980 I went to New York where I spent the Summer, having returned to Puerto Rico on August 9, 1980.

The cancelled checks were sent to me in New York and missed me by a few days. However, I went back to New York on August 23, 1980 and brought back with me an accumulation of papers which had gathered during the Summer, said checks included.

National Airlines, flight 249, September 5, 1980 refused to allow me to carry on board the box containing all my papers and checked same at the boarding gate. The box has been lost and I have been unsuccessfully trying for the last two weeks to trace it.

If it is found, I will immediately comply with your request as outlined in your letter of September 9, 1980.

Very truly yours,

Gilda Julia
Gilda Julia

mm

CERTIFIED WITH RETURN
RECEIPT # P18 9473873

E

1010231307

LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

TELEPHONE (202) 624-8800

CABLE ADDRESS

"CHADUP"

TELEX NUMBER 89-2798

WILLIAM R. DUFF
PAUL A. LENZINI
GENE PERRY BOND
JAMES S. HOSTETLER
LUIS GUINOT, JR.
W. N. HARRELL SMITH
ALBERT D. STURTEVANT
CARL W. ULRICH
CHARLES S. FAX
CHERYL C. BURKE
JOEL L. GREENE
ROBERT P. MURPHY
MICHAEL A. KELLY
JOSEPH J. ZIMMERMAN
LYNDA TROUTMAN O'SULLIVAN
WILLIAM A. HUTCHINS
NEAL J. TONKEN
BARBARA E. SCHNEIDER
TARA HARVEY
RICHARD A. MARESCA

OSCAR L. CHAPMAN
(1896-1978)

NORMAN S. PAUL
(1919-1978)

COUNSEL
EUGENE T. HERBERT
GARY CLYDE HUFBAUER

SAN JUAN P. R. OFFICE
SUITE 504

PAN AMERICAN BUILDING
HATO REY, PUERTO RICO 00917
TELEPHONE (809) 756-5454

RAFAEL A. GEIGEL
RESIDENT ASSOCIATE

WRITER'S DIRECT DIAL NUMBER

(202) 624-8831

January 12, 1981

Robert Bogin, Esquire
Office of the General Counsel
Federal Elections Commission
1325 K Street, N. W.
Washington, D. C. 20463

Re: MUR 1181 (80)

Dear Bob:

As per our telephone conversation of last week, enclosed please find the affidavit of Julia Rivera De Vincenti in the above-captioned matter. I urge you to prevail upon the Commission to conclude this matter, at least insofar as it involves Ms. De Vincenti, as soon as possible. I realize that the Commission may feel that there remain loose ends that should be tied. Be that as it may, it is clear from Ms. De Vincenti's testimony and her affidavit that she is personally unaware of any alterations to the checks at issue. She did not personally alter the checks; nor does she have information suggesting that one or more of her subordinates altered the checks. If the checks were, in fact, altered, it may well be that such was done at the instigation of one or both of the drawers of the checks.

By way of summary, Ms. De Vincenti's political activities and the possible alteration of corporate checks are two separate issues. Failure to resolve the second issue should not prevent resolution of the first, especially where, as here, Ms. De Vincenti stands to suffer a significant penalty.

Ms. De Vincenti's previous offer of settlement remains open. We are hopeful that the Commission will accede to its terms.

Sincerely,
Charles S. Fax
Charles S. Fax

enc.

CSF:pam

F

1 of 3

Copy

Bogin

12 P 2:40

IN RE:

MUR-1181

AFFIDAVIT OF JULIA RIVERA DE VINCENTI

SAN JUAN PUERTO RICO)

) ss.

JULIA RIVERA DE VINCENTI, being first duly sworn and upon oath, deposes and states upon information and belief as follows:

1. My name is Julia Rivera de Vincenti. My residence address is 762 López Sicardo Avenue, Dos Pinos, Río Piedras, Puerto Rico.

2. This affidavit is being given to supplement my deposition testimony on March 19, 1980 in the above-captioned matter. Further, it is being given at the express request of the Federal Election Commission, which request is set forth in letter dated November 21, 1980 to my counsel, Charles S. Fax.

3. I understand that the Federal Election Commission has information that the names of the payees on twelve corporate checks issued in the matter under investigation may have been changed from Comité Campaña George Bush to Ciudadano Pro Democracia. I understand further that the Federal Election Commission wishes to know whether I have any information concerning this matter, beyond my previous testimony.

4. As I testified in my deposition of March 19, 1980, my understanding was that the twelve corporate checks, originally made payable to Comité Campaña George Bush, were

F 2 of 3

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31710132000

returned to the donors. My further understanding was that the checks were reissued by the donors, made payable to Ciudadanos Pro Democracia. I personally did not solicit the original checks. Nor did I return the original checks to their donors. Nor did I personally receive new checks from the donors. Rather, the campaign volunteers who had originally solicited the contributions took the original checks and, upon information and belief, returned them to their donors, obtaining checks made payable to Ciudadanos Pro Democracia.

5. I have no information that the names of the payees on the original checks were altered. I find it most difficult to believe that the names were in fact altered. My understanding is that the names of the payees on both the original checks and the reissued checks were typed. Obviously, any effort to alter or erase the names of the original payees, and substitute different payees, would be obvious on the faces of the checks. Either the erasure marks would be evident, or the imprint made by the typewriter would be discernable, or both. I cannot imagine that a bank would cash twelve such checks or that the drawer of the checks, upon balancing his books, would fail to notice such irregularities.

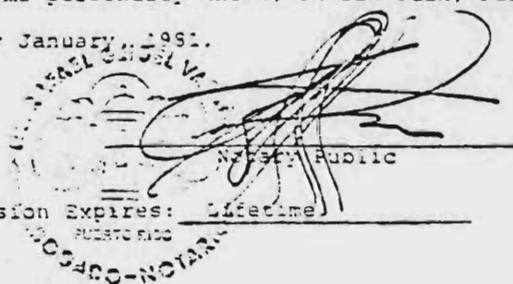
Further affiant saith not.

Julia Lee Vincenti
JULIA RIVERA DE VINCENTI

Affidavit No. 1588

Subscribed and sworn to before me by Julia Rivera de Vincenti, of legal age, married and resident of San Juan, Puerto Rico, to me personally known, in San Juan, Puerto Rico, this 9 day January, 1981.

My Commission Expires: Lifetime



F

3 of 3

Bogin

100707 RECEIVED
Sect# 4623

Paul M. Slavin

81 MAY 5 P12:34

P. O. Box 11605, SANTURCE, PUERTO RICO 00910

11 MAY 5 P 2:33

April 28, 1981

CERTIFIED WITH RETURN RECEIPT REQUESTED NUMBER P24 0139398

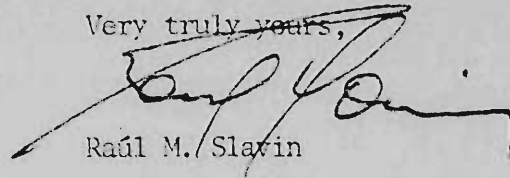
Mr. Charles N. Steele, Esq.
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

Re: MUR 1181

Dear Mr. Steele:

Enclosed please find sworn statement as per your request
of February 10, 1981.

Very truly yours,


Raúl M. Slavin

mm

Enclosures

G

1 of 4

31040282001

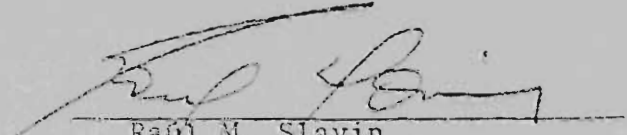
RECEIVED
DEC# 4623
81 MAY 5 12:34

31 MAY 5 P 2: 32
SWORN STATEMENT

I, Raúl M. Slavin, of legal age, married, businessman and a resident of Dorado, Puerto Rico, under oath depose and say:

That all the information contained in a letter I wrote to Mr. Gilberto S. Thillet, dated January 14, 1981, copy of which is attached hereto, is true to the best of my knowledge.

IN WITNESS WHEREOF I sign this statement under oath, in San Juan, Puerto Rico this 27 day of April, 1981.



Raúl M. Slavin

Affidavit No. 10.052

Sworn and subscribed to before me by Mr. Raúl M. Slavin, of legal age, married, a businessman and resident of Dorado, Puerto Rico, personally known to me.

San Juan, Puerto Rico this 27th.day of April 1981.





Notary Public

2 of 4

31710132702

SEC#4623
FEB 5 AM: 44

Paul M. Slavin

P. O. BOX 11605, SANTURCE, PUERTO RICO 00910

MAY 5

January 14, 1981

RECEIVED

Mr. Gilberto S. Thillet
Committee Member
Ciudadanos Pro Democracia
San Francisco Shopping Center
Rio Piedras, Puerto Rico

FEB 2 1981

CHAPMAN DUFF & PAUL

Dear Mr. Thillet:

I acknowledge receipt of your letter dated January 9, 1981 and of our telephone conversation on January 13, 1981.

I have checked into the circumstances of the Corporate contributions made to Ciudadanos Pro Democracia during the year 1980, and have come up with the following facts:

1. On September 6, 1979 twelve checks were issued by:
 - a. San Juan Realty Corporation
 - b. Industrial Warehouses, Inc.
 - c. City Enterprises, Inc.
 - d. Almac Enterprises, Inc.
 - e. Castle Enterprises, Inc.
 - f. Girafa, Inc.
 - g. Silver, Inc.
 - h. Triple A Investment, Inc.
 - i. Leasing & Brokerage, Inc.
 - j. Gateway Plaza, Inc.
 - k. Puerto Nuevo Distribution Center, Inc.
 - l. Puerto Nuevo Development Corporation

each in the amount of \$500.00. All checks were made out to George Bush for President.

3 of 4

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Mr. Gilberto Thillet

-2-

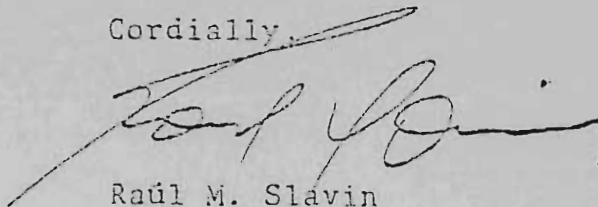
January 14, 1981

2. Subsequently, I received a call from someone who informed me that the Corporate contributions made by us were not allowed and that our checks were being returned to us and the payee had to be changed.

3. It seems that these checks were returned to my office and that one of our employees, rather than cancelling the checks and re-issuing same, opted for erasing the original payee and substituting the name "Ciudadanos Pro Democracia".

As far as I have been able to ascertain, these are the pertinent facts. However, my wife, Gilda, is now in New York and when she returns sometime at the end of the month, I shall ask her if she has any additional information on this matter.

Cordially,



Raúl M. Slavin

RMS:ml

31010132974

4 of 4

100407 RECEIVED
ACC# 4623

Paul M. Slavin

31 MAY 5 P12:34

P O Box 11605, SANTURCE, PUERTO RICO 00910

1 MAY 5 P 2: 33

April 28, 1981

CERTIFIED WITH RETURN RECEIPT REQUESTED NUMBER P24 0139398

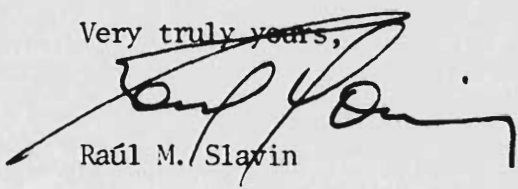
Mr. Charles N. Steele, Esq.
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

Re: MUR 1181

Dear Mr. Steele:

Enclosed please find sworn statement as per your request
of February 10, 1981.

Very truly yours,



Raúl M. Slavin

nm

Enclosures

31010131005

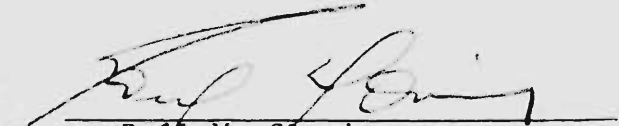
RECEIVED
SEC# 4623
81 MAY 5 P12:34

1 5 P2:32
SWORN STATEMENT

I, Raúl M. Slavin, of legal age, married, businessman and a resident of Dorado, Puerto Rico, under oath depose and say:

That all the information contained in a letter I wrote to Mr. Gilberto S. Thillet, dated January 14, 1981, copy of which is attached hereto, is true to the best of my knowledge.

IN WITNESS WHEREOF I sign this statement under oath, in San Juan, Puerto Rico this 27 day of April, 1981.

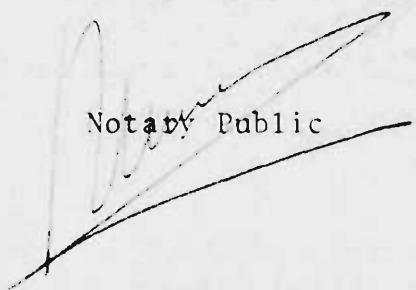

Raúl M. Slavin

Affidavit No. 10,052

Sworn and subscribed to before me by Mr. Raúl M. Slavin, of legal age, married, a businessman and resident of Dorado, Puerto Rico, personally known to me.

San Juan, Puerto Rico this 27th.day of April 1981.




Notary Public

31710131006

Sec# 4623
31 FEB 81 11:44

Paul M. Slavin

P. O. BOX 11605, SANTURCE, PUERTO RICO 00910

MAY 5

January 14, 1981

RECEIVED

Mr. Gilberto S. Thillet
Committee Member
Ciudadanos Pro Democracia
San Francisco Shopping Center
Rio Piedras, Puerto Rico

FEB 2 1981

CHAPMAN DUFF & PAUL

Dear Mr. Thillet:

I acknowledge receipt of your letter dated January 9, 1981 and of our telephone conversation on January 13, 1981.

I have checked into the circumstances of the Corporate contributions made to Ciudadanos Pro Democracia during the year 1980, and have come up with the following facts:

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 - d. Almac Enterprises, Inc.
 - e. Castle Enterprises, Inc.
 - f. Girafa, Inc.
 - g. Silver, Inc.
 - h. Triple A Investment, Inc.
 - i. Leasing & Brokerage, Inc.
 - j. Gateway Plaza, Inc.
 - k. Puerto Nuevo Distribution Center, Inc.
 - l. Puerto Nuevo Development Corporation

each in the amount of \$500.00. All checks were made out to George Bush for President.

3171013007

Mr. Gilberto Thillet

-2-

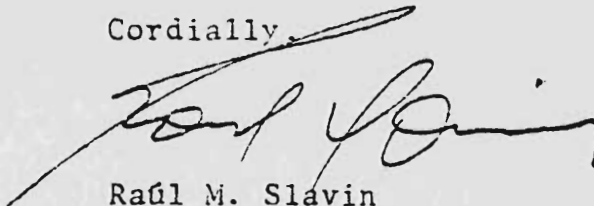
January 14, 1981

2. Subsequently, I received a call from someone who informed me that the Corporate contributions made by us were not allowed and that our checks were being returned to us and the payee had to be changed.

3. It seems that these checks were returned to my office and that one of our employees, rather than cancelling the checks and re-issuing same, opted for erasing the original payee and substituting the name "Ciudadanos Pro Democracia".

As far as I have been able to ascertain, these are the pertinent facts. However, my wife, Gilda, is now in New York and when she returns sometime at the end of the month, I shall ask her if she has any additional information on this matter.

Cordially,



Raúl M. Slavin

RMS:ml

311013000

P. O. Box 11605
Santurce, Puerto Rico 00910

RECEIVED



31010231000

CERTIFIED
P24 0139398
MAIL

Mr. Charles N. Steele, Esq.
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS / JODY CUSTER *jc*
DATE: MARCH 31, 1981
SUBJECT: MUR 1181 - Interim Conciliation Report #4,
dated 3-26-81; Received in OCS, 3-27-81, 4:54

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, March 30, 1981.

There were no objections to the Interim Conciliation Report at the time of the deadline.

March 27, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1181

Please have the attached Interim Concil Report distributed to the Commission. Thank you.

31710132711

BEFORE THE FEDERAL ELECTION COMMISSION
March 26, 1981

01 MAR 27 P 4: 54

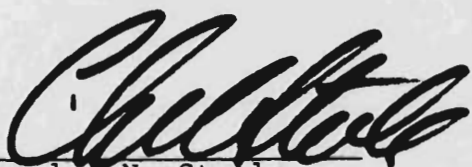
In the Matter of)
) MUR 1181
Julita R. de Vincenti)

INTERIM CONCILIATION REPORT #4

8 1 7 1 0 2 8 2 7 1 2

In February, 1980, the Commission found reason to believe that respondent violated 2 U.S.C. § 441b and § 441f in connection with the Bush for President presidential campaign. A pertinent fact in issue in this matter concerns the alteration of the payee line on twelve corporate checks. The donor of these checks has indicated that an agent of the donor may have been responsible for the alterations. We are in the process of confirming that this is so, and have requested an affidavit from the donor attesting to these facts. Receipt of this affidavit will in all likelihood terminate the investigation, and this Office will then be able to make the appropriate recommendations for closing this file.

27 March 1981
Date


Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Raul M. Slavin
P.O. Box 11605
Santurce, Puerto Rico 00910

RE: MUR 1181

Dear Mr. Slavin:

Pursuant to your request, enclosed please find your letter dated January 14, 1981 addressed to Mr. Gilberto S. Thillet. The Commission awaits your affidavit and requests that your affidavit be submitted no later than ten days upon receipt of this letter.

If you have any questions concerning this matter, please call Robert Bogin at (202) 523-4000.

Sincerely,

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Enclosure

3 1 0 1 0 2 3 2 9 1 3

Form 3811, July 1979

1. The following services is requested (check one):
 Show to whom and date delivered.
 Show to whom, date and address of delivery.
 RESTRICTED DELIVERY
 Show to whom and date delivered.
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery.

(SINGLE POSTMASTER FOR FEPS)

2. ARTICLE ADDRESS TO:

Raul Slavin

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 99952
 CERTIFIED NO. _____
 INSURED NO. _____

(Addressee's obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE: *James Williams*
 DATE OF DELIVERY: MARCH 18 1981

4. ADDRESS (Postmaster only if required)
 5. UNABLE TO DELIVER REASON:

RECEIVED

APR 1 1981

U.S. POSTAL SERVICE

7500-1000-000-000

Mur 1181 - Bogin

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Raul M. Slavin
P.O. Box 11605
Santurce, Puerto Rico 00910

RE: MUR 1181

Dear Mr. Slavin:

Pursuant to your request, enclosed please find your letter dated January 14, 1981 addressed to Mr. Gilberto S. Thillet. The Commission awaits your affidavit and requests that your affidavit be submitted no later than ten days upon receipt of this letter.

If you have any questions concerning this matter, please call Robert Bogin at (202) 523-4000.

Sincerely,

Kenneth A. Gross
Associate General Counsel

Enclosure

Prepared by Robert I. Bogin:ano 3/18/81 *RB*
Cleared by KMG

3171030011

Paul M. Slavin

31 FEB 6 AM 11:44

P. O. Box 11605, SANTURCE, PUERTO RICO 00910

January 14, 1981

RECEIVED

Mr. Gilberto S. Thillet
Committee Member
Ciudadanos Pro Democracia
San Francisco Shopping Center
Rio Piedras, Puerto Rico

FEB 2 1981

CHAPMAN DUFF & PAUL

Dear Mr. Thillet:

I acknowledge receipt of your letter dated January 9, 1981 and of our telephone conversation on January 13, 1981.

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 - c. City Enterprises, Inc.
 - d. Almac Enterprises, Inc.
 - e. Castle Enterprises, Inc.
 - f. Girafa, Inc.
 - g. Silver, Inc.
 - h. Triple A Investment, Inc.
 - i. Leasing & Brokerage, Inc.
 - j. Gateway Plaza, Inc.
 - k. Puerto Nuevo Distribution Center, Inc.
 - l. Puerto Nuevo Development Corporation

each in the amount of \$500.00. All checks were made out to George Bush for President.

Mr. Gilberto Thillet

-2-

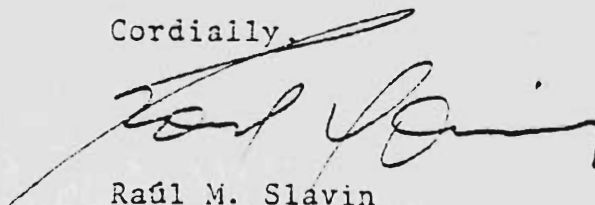
January 14, 1981

2. Subsequently, I received a call from someone who informed me that the Corporate contributions made by us were not allowed and that our checks were being returned to us and the payee had to be changed.

3. It seems that these checks were returned to my office and that one of our employees, rather than cancelling the checks and re-issuing same, opted for erasing the original payee and substituting the name "Ciudadanos Pro Democracia".

As far as I have been able to ascertain, these are the pertinent facts. However, my wife, Gilda, is now in New York and when she returns sometime at the end of the month, I shall ask her if she has any additional information on this matter.

Cordially,



Raúl M. Slavin

RMS:ml

31710232715

030 #
2/174

MAR 11 1981

Paul M. Slavin

P O Box 11605, SANTURCE, PUERTO RICO 00910

March 5, 1981

CERTIFIED WITH RETURN RECEIPT REQUESTED # P18 9473865

Mr. Charles N. Steele, Esq.
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Dear Mr. Steele:

I am in receipt of your letter dated February 10, 1981.

In order to comply with your request I need to have a copy of the letter dated January 14, 1981 which you state I sent to Mr. Gilberto Thillet.

Very truly yours,

Paul M. Slavin
Paul M. Slavin

ZR

31710300017

Maria

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4083

1181

STATEMENT UNDER OATH

I, GILBERTO THILLET, of legal age, married and residing in Rio Piedras, San Juan, Puerto Rico, after being duly sworn, depose and say:

1 MAR 4 1981
90:22

FIRST: That my name and personal circumstances are those expressed above.

SECOND: That my answers to the questionnaire submitted by the Federal Election Commission, are as follows:

1. No, I received a sealed envelope from a messenger sent by Mr. Slavin.
2. There was a meeting scheduled, I took the sealed envelope to said meeting and left it on top of the desk designated for computation and accounting procedures.
3. I don't know.
4. As far as I know after the facts, said change was authorized by Mr. Slavin.
5. The information already offered in the first four (4) answers of the questionnaire and that appearing on Mr. Slavin's letter, is the only one I have.

That this is the truth, nothing but the truth, so help me God.

GIVEN in Rio Piedras, San Juan, Puerto Rico, today the 27th of the month of February of the year 1981.

Gilberto Thillet
 GILBERTO THILLET
 Deponent

AFFIDAVIT NUM. 1617

Sworn and suscribe before me by Mr. Gilberto Thillet, of the personal circumstances stated above, personally known to me.

In Rio Piedras, San Juan, Puerto Rico, today the 27 of February 1981.

Asilio Roberto Rojas
 Notary Public
 Puerto Rico

3 1 0 1 0 1 0 2 0 1 0

STATEMENT UNDER OATH

I, GILBERTO THILLET, of legal age, married and residing in Rio Piedras, San Juan, Puerto Rico, after being duly sworn, depose and say:

FIRST: That my name and personal circumstances are those expressed above.

SECOND: That my answers to the questionnaire submitted by the Federal Election Commission, are as follows:

1. No, I received a sealed envelope from a messenger sent by Mr. Slavin.
2. There was a meeting scheduled, I took the sealed envelope to said meeting and left it on top of the desk designated for computation and accounting procedures.
3. I don't know.
4. As far as I know after the facts, said change was authorized by Mr. Slavin.
5. The information already offered in the first four (4) answers of the questionnaire and that appearing on Mr. Slavin's letter, is the only one I have.

That this is the truth, nothing but the truth, so help me God.

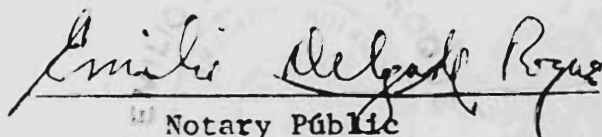
GIVEN in Rio Piedras, San Juan, Puerto Rico, today the 27th of the month of February of the year 1981.


GILBERTO THILLET
Deponent

AFFIDAVIT NUM. 1617

Sworn and suscribe before me by Mr. Gilberto Thillet, of the personal circumstances stated above, personally known to me.

In Rio Piedras, San Juan, Puerto Rico, today the 27 of February 1981.


Emilio Delgado Rojas
Notary Público

Puerto Rico



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
OFFICE OF THE SECRETARY TO THE COMMISSION

DATE: FEBRUARY 20, 1981

SUBJECT: MUR 1181 - Interim Conciliation Report #3,
dated 2-4-81; Signed 2-13-81; Received
in OCS 2-18-81, 2:38

The above-named document was circulated to the Commission on a no-objection basis at 11:00, February 19, 1981.

There were no objections to the Interim Conciliation Report at the time of the deadline.

3100000000

February 18, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1181

Please have the attached Interim Conciliation Report distributed to the Commission on a 24 hour no-objection basis. Thank you.

Attachment

pakayson

cc: Bogin

3170:3001

CERTIFIED

P18 5473060

MAIL

Mr. Charles N. Steele, Esq.
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463



3 1 2

CERTIFIED

P18 5473005

MAIL

Mr. Charles N. Steele, Esq.
FEDERAL ELECTION COMMISSION
Washington, D.C. 20465



BEFORE THE FEDERAL ELECTION COMMISSION
February 4, 1981

RECEIVED
FEB 18 1981
01 FEB 18 P 2: 38

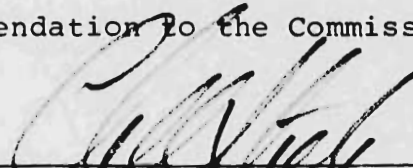
In the Matter of)
Julia R. de Vincenti) MUR 1181

INTERIM CONCILIATION REPORT #3

In a letter dated January 12, 1981, counsel for Julia Rivera de Vincenti forwarded his client's affidavit to this Office (Attachment). In her affidavit, respondent asserts that she is personally unaware of any alterations to the checks at issue in this matter.

In response to further inquiry from this Office, counsel has supplied the name of an individual who may be able to shed some light on this matter. A letter has been sent to this individual and the forthcoming response will be forwarded to the Commission. Pending receipt and review of this response, the Office of General Counsel will make the appropriate recommendation to the Commission.

13 FEB 19 81
Date


Charles N. Steele
General Counsel

Attachment

Letter and Affidavit

376

Bogin

LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

TELEPHONE (202) 624-8800

CABLE ADDRESS

"CHADUP"

TELEX NUMBER 89-2798

WILLIAM R. DUFF
PAUL A. LENZINI
GENE PERRY BOND
JAMES S. HOSTETLER
LUIS GUINOT, JR.
W. N. HARRELL SMITH
ALBERT D. STURTEVANT
CARL W. ULRICH
CHARLES S. FAX
CHERYL C. BURKE
JOEL L. GREENE
ROBERT P. MURPHY
MICHAEL A. KELLY
JOSEPH J. ZIMMERMAN
LYNDA TROUTMAN O'SULLIVAN
WILLIAM A. HUTCHINS
NEAL J. TONKEN
BARBARA E. SCHNEIDER
TARA HARVEY
RICHARD A. MARESCA

OSCAR L. CHAPMAN
(1898-1978)
NORMAN S. PAUL
(1919-1970)
COUNSEL
EUGENE T. HERBERT
GARY CLYDE HUFBAUER
SAN JUAN P. R. OFFICE
SUITE 504
PAN AMERICAN BUILDING
HATO REY, PUERTO RICO 00917
TELEPHONE (809) 756-5454
RAFAEL A. GEIGEL
RESIDENT ASSOCIATE
WRITER'S DIRECT DIAL NUMBER

January 12, 1981

(202) 624-8831

12
P 2: 40

Robert Bogin, Esquire
Office of the General Counsel
Federal Elections Commission
1325 K Street, N. W.
Washington, D. C. 20463

Re: MUR 1181 (80)

Dear Bob:

As per our telephone conversation of last week, enclosed please find the affidavit of Julia Rivera De Vincenti in the above-captioned matter. I urge you to prevail upon the Commission to conclude this matter, at least insofar as it involves Ms. De Vincenti, as soon as possible. I realize that the Commission may feel that there remain loose ends that should be tied. Be that as it may, it is clear from Ms. De Vincenti's testimony and her affidavit that she is personally unaware of any alterations to the checks at issue. She did not personally alter the checks; nor does she have information suggesting that one or more of her subordinates altered the checks. If the checks were, in fact, altered, it may well be that such was done at the instigation of one or both of the drawers of the checks.

By way of summary, Ms. De Vincenti's political activities and the possible alteration of corporate checks are two separate issues. Failure to resolve the second issue should not prevent resolution of the first, especially where, as here, Ms. De Vincenti stands to suffer a significant penalty.

Ms. De Vincenti's previous offer of settlement remains open. We are hopeful that the Commission will accede to its terms.

Sincerely,

Charles S. Fax

Charles S. Fax

enc.

CSF:pam

3171011

IN RE:

MUR-1181

AFFIDAVIT OF JULIA RIVERA DE VINCENTI

SAN JUAN PUERTO RICO)

) ss.

JULIA RIVERA DE VINCENTI, being first duly sworn and upon oath, deposes and states upon information and belief as follows:

1. My name is Julia Rivera de Vincenti. My residence address is 762 López Sicardo Avenue, Dos Pinos, Río Piedras, Puerto Rico.

2. This affidavit is being given to supplement my deposition testimony on March 19, 1980 in the above-captioned matter. Further, it is being given at the express request of the Federal Election Commission, which request is set forth in letter dated November 21, 1980 to my counsel, Charles S. Fax.

3. I understand that the Federal Election Commission has information that the names of the payees on twelve corporate checks issued in the matter under investigation may have been changed from Comité Campaña George Bush to Ciudadano Pro Democracia. I understand further that the Federal Election Commission wishes to know whether I have any information concerning this matter, beyond my previous testimony.

4. As I testified in my deposition of March 19, 1980, my understanding was that the twelve corporate checks, originally made payable to Comité Campaña George Bush, were

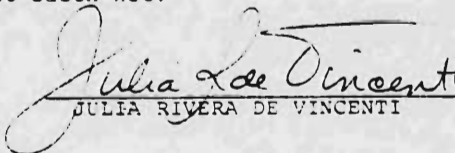
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returned to the donors. My further understanding was that the checks were reissued by the donors, made payable to Ciudadanos Pro Democracia. I personally did not solicit the original checks. Nor did I return the original checks to their donors. Nor did I personally receive new checks from the donors. Rather, the campaign volunteers who had originally solicited the contributions took the original checks and, upon information and belief, returned them to their donors, obtaining checks made payable to Ciudadanos Pro Democracia.

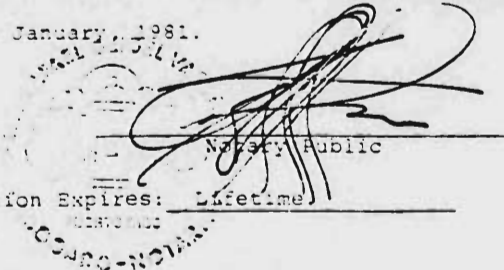
5. I have no information that the names of the payees on the original checks were altered. I find it most difficult to believe that the names were in fact altered. My understanding is that the names of the payees on both the original checks and the reissued checks were typed. Obviously, any effort to alter or erase the names of the original payees, and substitute different payees, would be obvious on the faces of the checks. Either the erasure marks would be evident, or the imprint made by the typewriter would be discernable, or both. I cannot imagine that a bank would cash twelve such checks or that the drawer of the checks, upon balancing his books, would fail to notice such irregularities.

Further affiant saith not.


JULIA RIVERA DE VINCENTI

Affidavit No. 1588

Subscribed and sworn to before me by Julia Rivera de Vincenti, of legal age, married and resident of San Juan, Puerto Rico, to me personally known, in San Juan, Puerto Rico, this 9 day January, 1981.


Notary Public
My Commission Expires: Lifetime

IN RE: _____ :
 :
 :
 MUR-1181 :
 :
 :
 _____ :

AFFIDAVIT OF JULIA RIVERA DE VINCENTI

SAN JUAN PUERTO RICO)
) ss.
 _____)

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Further affiant saith not.

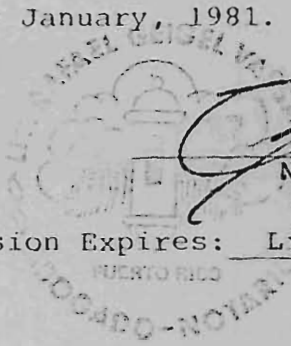
Julia de Vincenti
 JULIA RIVERA DE VINCENTI

Affidavit No. 1588

Subscribed and sworn to before me by Julia Rivera de Vincenti, of legal age, married and resident of San Juan; Puerto Rico, to me personally known, in San Juan, Puerto Rico, this 9 day January, 1981.

[Signature]
 Notary Public

My Commission Expires: Lifetime



BEFORE THE FEDERAL ELECTION COMMISSION
February 4, 1981

In the Matter of)
) MUR 1181
Julia R. de Vincenti)

INTERIM CONCILIATION REPORT #3

In a letter dated January 12, 1981, counsel for Julia Rivera de Vincenti forwarded his client's affidavit to this Office (Attachment). In her affidavit, respondent asserts that she is personally unaware of any alterations to the checks at issue in this matter.

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_____)
Date

_____)
Charles N. Steele
General Counsel

Attachment

Letter and Affidavit

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PS Form 3811 Aug 1978

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1 The following service is requested (check one):

- Show to whom and date delivered _____
- Show to whom, date, and address of delivery _____
- RESTRICTED DELIVERY Show to whom and date delivered _____
- RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ _____

(CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO:

Raul Sdamin

3 ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>5L1846</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Ismael Feliciano

4 DATE OF DELIVERY

FEB 20 1981

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE:

PREMIER DELIVERY SERVICE
FEB 20 1981
NEW YORK, NY

7575-772-582

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUX 1181- Boger



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 10, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Raul M. Slavin
P. O. Box 11605
Santurce, Puerto Rico 00910

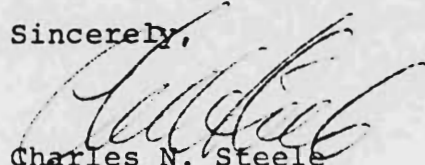
RE: MUR 1181

Dear Mr. Slavin:

The Federal Election Commission is in receipt of your letter dated January 14, 1981, to Mr. Gilberto S. Thillet wherein you state that twelve corporate checks that were initially issued to George Bush for President were returned to you and subsequently changed by one of your employees by erasing the original payee and substituting the name Ciudadanos Pro Democracia. In order to complete its investigation of these checks, the Commission requests that you submit a sworn affidavit that recites your knowledge of these checks. Please submit this affidavit to the Commission within ten days of your receipt of this letter.

The affidavit should include a complete recital of the facts surrounding your twelve corporate contributions starting with the initial solicitation for contributions for George Bush for President. If you have any questions concerning this matter, please call Robert Bogin at (202) 523-4000.

Sincerely,


Charles N. Steele
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Raul M. Slavin
P. O. Box 11605
Santurce, Puerto Rico 00910

RE: MUR 1181

Dear Mr. Slavin:

The Federal Election Commission is in receipt of your letter dated January 14, 1981, to Mr. Gilberto S. Thillet wherein you state that twelve corporate checks that were initially issued to George Bush for President were returned to you and subsequently changed by one of your employees by erasing the original payee and substituting the name Ciudadanos Pro Democracia. In order to complete its investigation of these checks, the Commission requests that you submit a sworn affidavit that recites your knowledge of these checks. Please submit this affidavit to the Commission within ten days of your receipt of this letter.

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Sincerely,

Charles W. Steele
General Counsel

Prepared by Robert I. Bogin:ano 2/6/81

RB 2/6

1 1 6 1 0 1 1 3

11.00K 1181- Bogusa

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3
Add your address in the RETURN TO space on reverse

1 The following service is requested (check one).

Show to whom and date delivered _____¢

Show to whom, date, and address of delivery _____¢

RESTRICTED DELIVERY
Show to whom and date delivered _____¢

RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$ _____
(CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO

Dr. Gilberto Thillat

3 ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	978160	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

DATE OF DELIVERY	POSTMARK
	981

5 ADDRESS Complete only if requested.

6 UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 4, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Gilberto Thillet
P. O. Box 4363
San Juan, Puerto Rico 00936

RE: MUR 1181

Dear Dr. Thillet:

The Federal Election Commission is an agency of the United States charged with the responsibility of administering and enforcing the Federal Election Campaign Act of 1971, as amended and Chapters 95 and 96 of the Internal Revenue Code of 1954, as amended. The Commission is reviewing a matter involving certain contributions made by corporations of Gilda Julia and Raul Slavin. It is our understanding that you have information concerning these contributions. In order to assist the Commission in its investigation of these contributions, the Commission requests that you answer the questions enclosed with this letter.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. No such consent has been made in this matter.

The Commission requests that your answers to these questions be submitted under oath and returned to the Commission within ten days of your receipt of this letter. If you have any questions concerning this matter, please direct them to Robert Bogin, the attorney handling this matter, at (202) 523-4000.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

Enclosure: Questions

FEDERAL ELECTION COMMISSION

Dr. Gilberto Thillet

MUR 1181

QUESTIONS

1. On or around September 6, 1979, did you receive checks made out to Comite Campana George Bush drawn on corporate accounts owned or controlled by Gilda Julia and/or Raul Slavin?
2. If the answer to question one is yes, what did you do with these checks?
3. Was the payee line on these checks subsequently changed from Comite Campana George Bush to Ciudadano Pro Democracia?
4. If so, who authorized the change of the payee?
5. Please relate any information you may possess concerning these checks. Such information should include a recital of names and dates and an explanation for any actions taken with respect to these checks.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Gilberto Thillet
P. O. Box 4363
San Juan, Puerto Rico 00936

RE: MUR 1181

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Sincerely,

Charles N. Steele
General Counsel

Enclosure: Questions

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2/2

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LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

TELEPHONE (202) 624-8800

CABLE ADDRESS

"CHADUP"

TELEX NUMBER 89-2798

WILLIAM R. DUFF
 PAUL A. LENZINI
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 COUNSEL
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 TELEPHONE (809) 756-5454
 RAFAEL A. GEIGEL
 RESIDENT ASSOCIATE

WRITER'S DIRECT DIAL NUMBER
 (202) 624-8831

February 3, 1981

Robert Bogin, Esquire
 Office of the General Counsel
 Federal Election Commission
 1325 K Street, N. W.
 Washington, D. C. 20463

Re: MUR 1181 (80)

Dear Bob:

In accordance with our telephone conversation this morning enclosed please find copy of letter from Gilberto S. Thillet to Raul M. Slavin, and copy of letter from Raul M. Slavin to Mr. Thillet. I understand that you are making independent inquiry of Mr. Slavin and Mr. Thillet. Please advise if the information that you obtain from them requires yet additional inquiry of Mrs. De Vincenti.

Needless to say I am hopeful that this matter can be resolved quickly. I would appreciate hearing from you as soon as you have information concerning the disposition.

Sincerely,

Charles S. Fax

encs.

CSF:pam

95 : 1 a 5 8311

Paul M. Slavin

P. O. BOX 11605, SANTURCE, PUERTO RICO 00910

January 14, 1981

Mr. Gilberto S. Thillet
Committee Member
Ciudadanos Pro Democracia
San Francisco Shopping Center
Rio Piedras, Puerto Rico

FEB 2 1981

CHAPMAN DUFF & PAUL

Dear Mr. Thillet:

I acknowledge receipt of your letter dated January 9, 1981 and of our telephone conversation on January 13, 1981.

I have checked into the circumstances of the Corporate contributions made to Ciudadanos Pro Democracia during the year 1980, and have come up with the following facts:

1. On September 6, 1979 twelve checks were issued by:
 - a. San Juan Realty Corporation
 - b. Industrial Warehouses, Inc.
 - c. City Enterprises, Inc.
 - d. Almac Enterprises, Inc.
 - e. Castle Enterprises, Inc.
 - f. Girafa, Inc.
 - g. Silver, Inc.
 - h. Triple A Investment, Inc.
 - i. Leasing & Brokerage, Inc.
 - j. Gateway Plaza, Inc.
 - k. Puerto Nuevo Distribution Center, Inc.
 - l. Puerto Nuevo Development Corporation

each in the amount of \$500.00. All checks were made out to George Bush for President.

31010130110

Mr. Gilberto Thillet

-2-

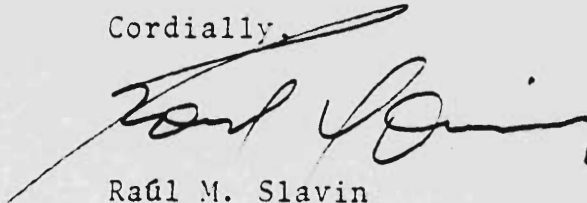
January 14, 1981

2. Subsequently, I received a call from someone who informed me that the Corporate contributions made by us were not allowed and that our checks were being returned to us and the payee had to be changed.

3. It seems that these checks were returned to my office and that one of our employees, rather than cancelling the checks and re-issuing same, opted for erasing the original payee and substituting the name "Ciudadanos Pro Democracia".

As far as I have been able to ascertain, these are the pertinent facts. However, my wife, Gilda, is now in New York and when she returns sometime at the end of the month, I shall ask her if she has any additional information on this matter.

Cordially,



Raúl M. Slavin

RMS:ml

3171013010

CIUDADANOS PRO-DEMOCRACIA
SAN FRANCISCO SHOPPING CENTER
RIO PIEDRAS, PUERTO RICO

January 9, 1981

Mr. Raul Slavin
President
Tierra, Inc. and Others
Bo. Palmas
Cataño, Puerto Rico

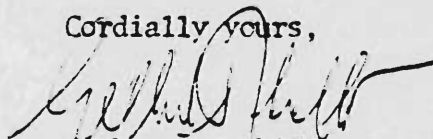
Dear Mr. Slavin:

We make reference to the corporate contributions that you made to Ciudadanos Pro-Democracia during the year 1980.

Because of some discrepancies and related questioning, we would be grateful if you would let us know how these contributions were handled.

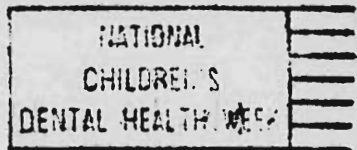
With my best personal regards, I remain

Cordially yours,



Gilberto S. Thillet
Committee Member

LAW OFFICES
CHAPMAN, DUFF AND PAUL
1730 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006



Robert Bogin, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

3710

LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

TELEPHONE (202) 624-8800

CABLE ADDRESS

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OSCAR L. CHAPMAN
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COUNSEL

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TELEPHONE (809) 756-5454

RAFAEL A. GEIGEL
RESIDENT ASSOCIATE

WRITER'S DIRECT DIAL NUMBER

(202) 624-8831

12
2:40

WILLIAM R. DUFF
PAUL A. LENZINI
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NEAL J. TONKEN
BARBARA E. SCHNEIDER
TARA HARVEY
RICHARD A. MARESCA

January 12, 1981

Robert Bogin, Esquire
Office of the General Counsel
Federal Elections Commission
1325 K Street, N. W.
Washington, D. C. 20463

Re: MUR 1181 (80)

Dear Bob:

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Ms. De Vincenti's previous offer of settlement remains open. We are hopeful that the Commission will accede to its terms.

Sincerely,

Charles S. Fax
Charles S. Fax

enc.

CSF:pam

IN RE: :
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 MUR-1181 :
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 :
 :

AFFIDAVIT OF JULIA RIVERA DE VINCENTI

SAN JUAN PUERTO RICO)
) ss.
)

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returned to the donors. My further understanding was that the checks were reissued by the donors, made payable to Ciudadanos Pro Democracia. I personally did not solicit the original checks. Nor did I return the original checks to their donors. Nor did I personally receive new checks from the donors. Rather, the campaign volunteers who had originally solicited the contributions took the original checks and, upon information and belief, returned them to their donors, obtaining checks made payable to Ciudadanos Pro Democracia.

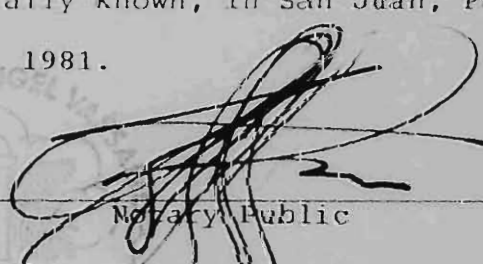
5. I have no information that the names of the payees on the original checks were altered. I find it most difficult to believe that the names were in fact altered. My understanding is that the names of the payees on both the original checks and the reissued checks were typed. Obviously, any effort to alter or erase the names of the original payees, and substitute different payees, would be obvious on the faces of the checks. Either the erasure marks would be evident, or the imprint made by the typewriter would be discernable, or both. I cannot imagine that a bank would cash twelve such checks or that the drawer of the checks, upon balancing his books, would fail to notice such irregularities.

Further affiant saith not.

Julia Lee Vincenti
 JULIA RIVERA DE VINCENTI

Affidavit No. 1588

Subscribed and sworn to before me by Julia Rivera de Vincenti, of legal age, married and resident of San Juan, Puerto Rico, to me personally known, in San Juan, Puerto Rico, this 9 day January, 1981.


 Notary Public

My Commission Expires: Lifetime

LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

Robert Bogin, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: JANUARY 7, 1980
SUBJECT: MUR 1181 - Interim Conciliation Report #2
Dated 12-19-80; Received in OCS 12-22-80,
11:00

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, December 22, 1980.

There were no objections to the Interim Conciliation Report at the time of the deadline.

2
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1
1
8

December 22, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: ElissaaT. Garr
SUBJECT: MUR 1181

Please have the attached Interim Concil Report distributed to the Commission. Thank you.

31010222013

BEFORE THE FEDERAL ELECTION COMMISSION


In the Matter of)
) MUR 1181
Julita R. de Vincenti)

DEC 22 11:00

INTERIM CONCILIATION REPORT #2

On November 21, 1980, this Office sent respondent's counsel a letter requesting a sworn statement concerning respondent's knowledge of contributions made by corporations owned by Gilda Julia. Counsel notified this Office that a response to the November 21, 1980 letter would be forthcoming. We will forward this response when it arrives to the Commission with an accompanying recommendation concerning what, if any, further action should be taken in this matter.

19 December 1980
Date



Charles N. Steele
General Counsel

817030101018



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles S. Fax
Chapman, Duff and Paul
1730 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1181

Dear Mr. Fax:

This Office is in receipt of your letter dated August 12, 1980, wherein you enclosed a proposed conciliation agreement signed by your client, Julita R. de Vincenti, with her check for \$2,200. You should be advised that your proposed settlement of this matter has not yet been submitted for Commission approval. Submission of your proposed agreement has been deferred pending further investigation of the contributions made by the twelve corporations controlled by Guilda Julia. Specifically, in order to complete its investigation, the Commission needs further information concerning your client's knowledge as to the circumstances surrounding these twelve contributions.

The Commission's investigation reveals that Mrs. Julia apparently was not aware that her contributions originally made payable to Comite Capana George Bush were ultimately made payable to Ciudadanos Pro Democracia. (See written instruments enclosed with this letter.) Questions remain unanswered as to which person or persons may be responsible for changing the names on the twelve corporate checks. Thus, the Commission requests that your client submit a statement under oath concerning her knowledge of this matter.

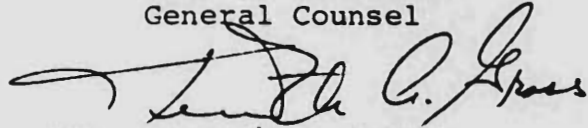
3170301010

Letter to Charles S. Fax
Page Two
MUR 1181

Please forward to this Office your client's sworn statement as soon as possible. If you have any questions concerning this matter, please call Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

Enclosure

cc: Rafael Geigel-Vassallo

31010131031

MUR 1181 - Bogin

Form 3811, Jan. 1978

Complete lines 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

Show to whom and date delivered.....

Show to whom, date and address of delivery.....

RESTRICTED DELIVERY
Show to whom and date delivered.....

RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.3

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Charles S. Fax

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>947405</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Sydney Jones

4. DATE OF DELIVERY *1/12/78* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

★GPO : 1978-288-848

PUERTO NUEVO DISTRIBUTION CENTER, INC.
 P.O. BOX 11605
 SAN JUAN, PUERTO RICO 00910

№ 2225
 101 204
 215

September 6, 79

CUENTA CAPAFIA GEORGE BUSH 500.00⁰⁰

CITIBANK
 Citibank, N.A.

Hato Rey, P. R. 00910

PUERTO NUEVO DISTRIBUTION CENTER, INC.

COPY NOT NEGOTIABLE

[Handwritten Signature]

⑆024502040⑆ 0483788⑈

PUERTO NUEVO DISTRIBUTION CENTER, INC.

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

⑆024502040⑆ 0483788⑈

PUERTO NUEVO DEVELOPMENT CO.
APARTADO 11605 SANTURCE 00910

101-204
215

2488

FIRST NATIONAL CITY BANK
Halo Rey Branch, Santurce, Puerto Rico

September 6, 19 79

PAY THE AMOUNT OF
TO THE ORDER OF:

500 00 00

\$ 500.0000

COMITE CANAIA GEORGE BUSH

PUERTO NUEVO DEVELOPMENT CORP

[Signature]
AUTHORIZED SIGNATURE
COPY - NOT NEGOTIABLE
[Signature]
AUTHORIZED SIGNATURE

⑆0215⑉0204⑆ 0478237⑈

DETACH BEFORE DEPOSITING

VOUCHER

DESCRIPTION	DATE	AMOUNT	DISCOUNT	BALANCE

IN FULL PAYMENT OF ABOVE INVOICES

8 5 6 1 8 2 0 1 0 1 8

LEASING & BROKERAGE, INC.

APARTADO 11605 SANTURCE 00910

520

101.004
215

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

DATE: _____ 19 72

PAY THE AMOUNT OF
TO THE ORDER OF:

Leasing & Brokerage, Inc.

CHECK NUMBER: _____

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

⑆0215⑆⑆0204⑆ 0240680⑆

DETACH BEFORE DEPOSITING

VOUCHER

DESCRIPTION	DATE	AMOUNT	DISCOUNT	BALANCE

IN FULL PAYMENT OF ABOVE INVOICES

3101022251

CITY ENTERPRISES, INC.
 P. O. BOX 11005
 SAN JUAN, PUERTO RICO 00910

100-223
 215

NO 223

DATE September 6, 1979

PAY TO THE ORDER OF COMITE CARPA GEORGE BUSH \$ 500.00**

500 00/100 DOLLARS

CITY ENTERPRISES, INC.

FIRST NATIONAL CITY BANK
 HATO REY, PUERTO RICO

George Bush
 NON-NEGOTIABLE

⑆0215⑉0201⑆ 0678946⑈

CITY ENTERPRISES, INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSING THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	DUP NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

⑆0215⑉0201⑆ 0678946⑈

CASTLE ENTERPRISES, INC.

P. O. BOX 11605
SANTURCE, P.R. 00910

NO 123

101 202
215

September 6, 79

CHEQUE CASHIA GEORGE BIERI

500.00**



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

COPY NOT NEGOTIABLE

Handwritten signature
George Bieri

⑆0215⑆0202⑆859⑆1115762⑆

CASTLE ENTERPRISES, INC.

DATE	DESCRIPTION	AMOUNT

9 5 0 2 8 0 6 1 0 7 8

INDUSTRIAL WAREHOUSE INC.

P. O. BOX 11605
SANTURCE, PUERTO RICO

101-204
215

No 990

DATE September 6, 1979

PAY
TO THE ORDER OF

DOLLARS \$ 500.00⁰⁰

OMTE CAPANA GEORGE BERT

INDUSTRIAL WAREHOUSES INC.

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

NON NEGOTIABLE

⑆0215⑆⑆0204⑆ 0214775⑆

INDUSTRIAL WAREHOUSES INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING:

PERIOD ENDING	HOURS			EARNINGS				DEDUCTIONS					NET PAY
	REG	OT	TOTAL	REGULAR	OVERTIME	OTHER	TOTAL	F.I.C.A.	WITHHELD IND. TAX	STATE TAX	INS		

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	DUPLICATE NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

8 1 0 1 0 1 3 2 0 7

SAN JUAN REALTY CORP.

P. O. BOX 11605
SANTURCE, P.R. 00910

NO 168

101702
215

September 6,

79

COMITE CAMPAÑA GEORGE BUSH

500.00**



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

COPY NOT NEGOTIABLE

⑆0215⑆0202⑆ 059⑆173701⑆

SAN JUAN REALTY CORP.

DATE	DESCRIPTION	AMOUNT

810103223

GIRAFI, INC.
 P. O. BOX 11005
 SAN JUAN, PUERTO RICO 00910

101-203
 215

Nº 553

DATE September 6, 1979

PAY TO THE ORDER OF EXHIBIT CAPANA GEORGE BUSI

500.00⁰⁰
George Busi

500 00/100

DOLLARS

GIRAFI, INC.

NON-NEGOTIABLE

George Busi

FIRST NATIONAL CITY BANK
 HATO REY, PUERTO RICO

⑆0215⑆0204⑆0178938⑆

GIRAFI, INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING:

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID



TRIPLE A INV. INVESTMENTS, INC.
 P. O. BOX 11605
 SAN JUAN, PUERTO RICO 00910

100-201 132 2
 216
 DATE September 6, 1979

PAY TO THE ORDER OF _____ DOLLARS \$ 500.00**

COMITE CAPANA GEORGE BUSH

TRIPLE-A INVESTMENTS, INC.

FIRST NATIONAL CITY BANK
 SAN JUAN, PUERTO RICO

NON NEGOTIABLE

43725-02061 02345.50

TRIPLE A INVESTMENTS, INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING:

PERIOD ENDING	HOURS			EARNINGS				DEDUCTIONS					NET PAY	
	REG	OT	TOTAL	DOLLAR	OVERTIME	OTHER	TOTAL	FICA	WITHHELD INC TAX	STATE TAX	INS			

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	CHK NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

09011701018

GATEWAY PLAZA, INC.

P.O. BOX 11605
SANITIZO, P.R. 00910

№

1501


101-204
216

September 6,

79

COMITE CARAPA GEORGE BUSH

500.00**

CITIBANK 

Citibank, N.A.

Auto Pay, P. H. 00018

COPY NOT NEGOTIABLE

[Handwritten signature]
[Handwritten signature]

⑆0215⑆0204⑆ 0192086⑆

GATEWAY PLAZA, INC.

DATE	DESCRIPTION	AMOUNT

⑆0215⑆0204⑆ 0192086⑆

ALMAC ENTERPRISES, INC.
 P. O. BOX 11605
 SAN JUAN, PUERTO RICO 00910

101-20A 001642
 215

September 6, 1979

PAY TO THE ORDER OF COMTE CAPASA GEORGE BUSH \$ 500.00⁰⁰

500 00/100

DOLLARS

ALMAC ENTERPRISES, INC.

FIRST NATIONAL CITY BANK
 HATO REY, PUERTO RICO

[Signature]
 NON-NEGOTIABLE

ALMAC ENTERPRISES, INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

25028001018

GIRAFÁ, INC.
P. O. BOX 11625
SANTURCE, PUERTO RICO 00910

101-204
215

Nº 553

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

FIVE HUNDRED DOLLARS

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

GIRAFÁ, INC.

[Handwritten Signature]

⑆0215⑉0204⑆ 0478958⑈

SAN JUAN REALTY CORP.
P. O. BOX 11625
SANTURCE, P.R. 00910

Nº 166

September 6, 1979

101-204
215

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

FIVE HUNDRED DOLLARS



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

[Handwritten Signature]

⑆0215⑉0204⑆ 0478958⑈

INDUSTRIAL WAREHOUSE INC.
P. O. BOX 11625
SANTURCE, PUERTO RICO

101-204
215

Nº 810

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

FIVE HUNDRED DOLLARS

CIUDADANO PRO DEMOCRACIA

INDUSTRIAL WAREHOUSES INC.

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

[Handwritten Signatures]

⑆0215⑉0204⑆ 0478958⑈

CASTLE ENTERPRISES, INC.

P. O. BOX 11605
SANTURCE, P.R. 00710

No 123

101-252
215

September 6, 1979

PAY TO THE
ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

Five Hundred Dollars and 00/100ths

001175



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

[Handwritten signature]
[Handwritten signature]

⑆0215⑉0202⑆ 899⑉144752⑆

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

⑆0215⑉0204⑆ 0475229⑆

3 1 0 1 0 1 0 1 0 1 0

ALMAC ENTERPRISES, INC.
P. O. BOX 1605
SANTURCE, PUERTO RICO 00910

254
15 001642

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

FIVE HUNDRED DOLLARS

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

ALMAC ENTERPRISES, INC.

⑆0215⑉0204⑆ 0464983⑈

CITY ENTERPRISES, INC.
P. O. BOX 11305
SANTURCE, PUERTO RICO 00910

191-224
215

NO 223

DATE September 6, 1979

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6

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

FIVE HUNDRED DOLLARS

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

CITY ENTERPRISES, INC.

⑆0215⑉0204⑆ 0478763⑈

LEASING & BROKERAGE, INC.
APARTAO 11605 SANTURCE 00910

520

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

September 6, 1979

THE AMOUNT OF FIVE HUNDRED DOLLARS

CIUDADANO PRO DEMOCRACIA

⑆0215⑉0204⑆ 0240880⑈

SILVER, INC.

PAY BANK 11005
SALVADOR, C.R. 00110

3 1 0 4 0 1 3 1 0 6 7

101 204
216

CHECK NO.

101 204

9-06-79

DOLLARS AND CENTS

EXACTLY \$500.00/100⁰⁰

\$ 500.00⁰⁰

SILVER, INC.

[Handwritten Signature]

CITIZEN BANK

CITIZEN BANK

PAY TO THE ORDER OF

CIUDADANO PRO DEMOCRACIA

FIRST NATIONAL CITY BANK
MEMBER FEDERAL RESERVE

⑆0215⑆⑆0201⑆ 01.76.269⑆

GATEWAY PLAZA, INC.

P.O. BOX 11635
SANTURCE, P.R. 00910

No 1501

101-204
215

September 5, 19 79

PAY TO THE
ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

Five Hundred Dollars

DOLLARS

CITIBANK

Citibank, N.A.

Maleo Rey, P.R. 00918

Ronald Quiñones
Glenn Felicia

⑆0215⑆0204⑆0492082⑆

PUERTO NUEVO DEVELOPMENT CORP.

APARTADO 11605 SANTURCE 00910

2488

FIRST NATIONAL CITY BANK

Maleo Rey Branch, Santurce, Puerto Rico

September 5 19 79

PAY THE AMOUNT OF
TO THE ORDER OF

Five Hundred Dollars

\$ 500.00**

PUERTO NUEVO DEVELOPMENT CORP

CIUDADANO PRO DEMOCRACIA

Ronald Quiñones
AUTHORIZED SIGNATURE
Glenn Felicia
AUTHORIZED SIGNATURE

⑆0215⑆0204⑆0478232⑆

TRIPLE A INVESTMENTS, INC.

P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-204
215

No

2

DATE September 5, 1979

PAY
TO THE ORDER OF

Five Hundred Dollars

DOLLARS \$ 500.00**

CIUDADANO PRO DEMOCRACIA

TRIPLE A INVESTMENTS, INC.

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

Ronald Quiñones
Glenn Felicia

⑆0215⑆0204⑆0339⑆

3 1 2 1 0 1 3 1 2 5 2
PUERTO NUEVO DISTRIBUTION CENTER, INC.

NO 2225

P.O. BOX 1163
SANTO SPIRITO, PUERTO RICO 00910

101-201
215

September 6, 19 79

PAY TO THE
ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00⁰⁰

Five hundred and 00/100

DOLLARS

CITIBANK

CITIBANK, P.A.

First City P.R. 02210

PUERTO NUEVO DISTRIBUTION CENTER, INC.

Jose Luis Rodriguez

⑆021502040⑆ 01076269⑆

ATMOSPHERE

FIRST NATIONAL CITY BANK
FIRST CITY NATIONAL BANK

⑆021502040⑆ 01076269⑆



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: OCTOBER 28, 1980
SUBJECT: MUR 1181 - Interim Conciliation Report
#1 dated 10-24-80; Received in OCS
10-27-80, 11:33

The above-named document was circulated to the Commission on a no-objection basis at 4:00, October 27, 1980.

There were no objections to the Interim Conciliation Report at the time of the deadline.

October 27, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1181

Please have the attached Interim Concil Report
distributed to the Commission. Thank you.

010101010101

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Julita R. de Vincenti) MUR 1181

8908-21 411:33

INTERIM CONCILIATION REPORT #1

This matter involves the acceptance of several corporate contributions by a local Committee official of the Bush presidential campaign. The official, Ms. Julita R. de Vincenti, is the respondent in this matter. In July, 1980, the Commission approved


31010131072

On August 25, 1980 this Office received a letter from Gilda Julia (Attachment "A"), the president of twelve of the corporations that allegedly contributed to Ciudadanos Pro Democracia. This letter was in response to a letter from this Office (Attachment "B") which inquired as to the identity of the recipient of the corporate contributions. Mrs. Julia responded that the intended recipient

of her contributions was the George Bush Committee, and she enclosed copies of the checks she had contributed which revealed that the payee of these checks was the George Bush for President Committee. This Office sent another letter (Attachment "C") to Ms. Julia asking her to forward the original cancelled checks representing the contributions in question. In a letter dated September 22, 1980, Ms. Julia informed this Office that the cancelled checks in issue are not now in her possession and are probably lost. (Attachment "D").

On March 19, 1980, the Office of General Counsel took the deposition of respondent, Julita R. de Vincenti. During the deposition, respondent was questioned about corporate contributions. Respondent testified that all corporate contributions payable to the George Bush Committee had been returned to their corporate donors, and checks payable to Ciudadanos Por Democracia were issued in their stead. Specifically, respondent was asked whether Ms. Julia's corporate contributions were payable to Ciudadanos Pro Democracia. Respondent answered in the affirmative. (de Vincenti Deposition, pgs 32-36, Attachment "E"). Respondent's testimony appears to be inconsistent with the assertions made by Ms. Julia. Therefore, this Office is preparing a letter to respondent's counsel, asking for an explanation of this apparent inconsistency. We will forward counsel's response to the Commission as soon as it arrives, along with any further recommendation necessary to settle this matter.

24 October 1980
Date


Charles N. Steele
General Counsel

Attachments

- "A" - letter dated August 19, 1980 from Gilda Julia
- "B" - letter dated June 11, 1980 to " "
- "C" - letter dated September 9, 1980 to " "
- "D" - letter dated September 22, 1980 from " "
- "E" - deposition of respondent pg 32-36

3104023271

"A"

2138

pg 1 of 13

1181

RECEIVED

GILDA JULIA
P. O. Box 11605
SANTURCE, P. R. 00910

80 AUG 25 P12:46

August 19, 1980

Mr. Charles N. Steele
General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

Dear Mr. Steele:

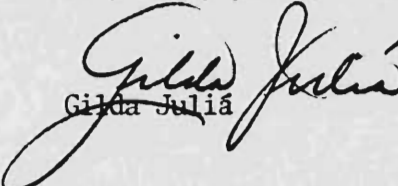
I acknowledge receipt of your letter dated June 11, 1980. However, I was away all Summer and did not have access to my files until I returned to Puerto Rico on the 9th. of August.

Enclosed please find the original copies of the checks which were issued to Comité Campaña George Bush.

I have no idea why the photocopies which you have enclosed seem to have been issued to Ciudadanos Pro Democracia.

Please return my original copies as soon as you have completed your examination.

Very truly yours,


Gilda Julia

mm

Enclosures

CERTIFIED WITH RETURN
RECEIPT REQUESTED # P27 3254778

80 AUG 25 3:03

17103073

PUERTO NUEVO DISTRIBUTION CENTER, INC.

P.O. BOX 11605
SANTURCE, PUERTO RICO 00910

Nº 2225

101-204
215

September 6, 79

COMITE CAPATA GEORGE BUSH

500.00**

CITIBANK+

Citibank, N.A.

Hato Rey, P. R. 00918

PUERTO NUEVO DISTRIBUTION CENTER, INC.

COPY NOT NEGOTIABLE

George Bush

⑆021502040⑆ 0483788⑈

PUERTO NUEVO DISTRIBUTION CENTER, INC.

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

152 of 18

920000000000

2488

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

September 11, 19 79

PAY THE AMOUNT OF
TO THE ORDER OF

50 00

\$ 50.00

COMITE CAPANA GEORGE BUSU

PUERTO NUEVO DEVELOPMENT CORP.

[Signature]
AUTHORIZED SIGNATURE
COPY - NOT NEGOTIABLE
[Signature]
AUTHORIZED SIGNATURE

⑆0215⑆0204⑆ 0478237⑆

DETACH BEFORE DEPOSITING

VOUCHER

DESCRIPTION	DATE	AMOUNT	DISCOUNT	BALANCE

IN FULL PAYMENT OF ABOVE INVOICES

2 2 0 7 2 0 1 0 1 8

5190351

LEASING & BROKERAGE, INC.

APARTADO 11605 SANTURCE 00910

520

101 204
215

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

19 70

PAY THE AMOUNT OF _____
TO THE ORDER OF:

\$ _____

┌

┐

Leasing & Brokerage, Inc.

AUTHORIZED SIGNATURE

└

┘

AUTHORIZED SIGNATURE

⑆0215⑆⑆0204⑆ 0240680⑆⑆

DETACH BEFORE DEPOSITING

VOUCHER

DESCRIPTION	DATE	AMOUNT	DISCOUNT	BALANCE

IN FULL PAYMENT OF ABOVE INVOICES

15 4 of 13

⑆0215⑆⑆0204⑆ 0240680⑆⑆

CITY ENTERPRISES, INC.
 P. O. BOX 11605
 SANURCE, PUERTO RICO 00910

101-234
 215

NO 223

DATE September 6, 1979

PAY TO THE ORDER OF COMITE CAPANA GEORGE BUSI \$ 500.00**

500 00

DOLLARS

CITY ENTERPRISES, INC.

FIRST NATIONAL CITY BANK
 HATO REY, PUERTO RICO

George Busi
 NON NEGOTIABLE

⑆0215⑉0204⑆ 0478946⑈

CITY ENTERPRISES, INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

195 of 13

⑆0215⑉0204⑆ 0478946⑈

CASTLE ENTERPRISES, INC.

P. O. BOX 11605
SANTURCE, P.R. 00910

No 123

101-202
215

September 6, 79

CHEQUE CASHIA GEORGE BUEH

500.00**



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

COPY NOT NEGOTIABLE

George Bueh
John J. [unclear]

⑆0215⑆0202⑆859⑆1145762⑆

CASTLE ENTERPRISES, INC.

DATE	DESCRIPTION	AMOUNT

896 of 13

000000000000

INDUSTRIAL WAREHOUSE INC.

P. O. BOX 11605
SANTURCE, PUERTO RICO

101-204
215

Nº 990

DATE September 6, 1979

PAY _____ DOLLARS \$ 500.00**
TO THE ORDER OF _____

COMITE CAPANA GEORGE BUSH

INDUSTRIAL WAREHOUSES INC.

[Signature]
NON NEGOTIABLE
[Signature]

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

⑆0215⑆⑆0204⑆ 0244775⑆

157 of 13

INDUSTRIAL WAREHOUSES INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING:

PERIOD ENDING	HOURS			EARNINGS				DEDUCTIONS					NET PAY	
	REG.	O.T.	TOTAL	REGULAR	OVERTIME	OTHER	TOTAL	F.I.C.A.	WITHHOLD- ING TAX	STATE TAX	INS			

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

1 8 0 0 0 0 0 1 8

SAN JUAN REALTY CORP.

P. O. BOX 11605
SANTURCE, P.R. 00910

Nº 168

101 202
215

September 6, 79

COMITE CAMPAÑA GEORGE BUSH

500.00**

COPY NOT NEGOTIABLE



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

George Bush

⑆0215⑆0202⑆859⑆1737014⑆

SAN JUAN REALTY CORP.

DATE	DESCRIPTION	AMOUNT

By 8 of 13
10/8/79

1 0 0 1 8 : 0 1 0 1 8

3 1 0 1 0 3 3 3 3

GIRAF INC.

P. O. BOX 11605

SANTURCE, PUERTO RICO 00910

101-204
215

Nº 553

DATE September 6, 1979

PAY TO THE ORDER OF COMITE CAPANA GEORGE BUSH

[Signature] \$ **500.00****

500 00

DOLLARS

GIRAF, INC.

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

[Signature]
NON - NEGOTIABLE

⑆0215⑆0204⑆0478938⑈

GIRAF, INC.

PLEASE DETACH BEFORE DEPOSITING. BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING:

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

pg 0813

31710131731
TRIPLE A INVESTMENTS, INC.
 P. O. BOX 11605
 SANTURCE, PUERTO RICO 00910

101-204
218

№?

2

DATE September 6, 1979

PAY
TO THE ORDER OF

DOLLARS \$ 500.00**

COMITE CAPANA GEORGE DIEGO

TRIPLE A INVESTMENTS, INC.

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

Paul Young

NON NEGOTIABLE
James J. ...

02346450

TRIPLE A INVESTMENTS, INC.

PLEASE DETACH BEFORE DEPOSITING BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING:

PERIOD ENDING	HOURS			EARNINGS				DEDUCTIONS					NET PAY
	REG	OT	TOTAL	REGULAR	OVERTIME	OTHER	TOTAL	F.I.C.A.	WITHHOLD- ING TAX	STATE TAX	INS.		

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

9/10/79

3 1 7 1 0 1 3 1 2 3 5
GATEWAY PLAZA, INC.

P.O. BOX 11605
SANTURCE, P.R. 00910

No 1501

101-204
216

September 6,

79

COMITE CARPAIA GEORGE BUSH

500.00**

CITIBANK+

Citibank, N.A.

Hato Rey, P.R. 00918

COPY NOT NEGOTIABLE

George Bush
Julia

⑆0215⑆⑆0204⑆ 0492086⑆

GATEWAY PLAZA, INC.

DATE	DESCRIPTION	AMOUNT

py 11/6/13

ALMAC ENTERPRISES, INC.
 P. O. BOX 11605
 SANTURCE, PUERTO RICO 00910

101:206
 215 001642

DATE September 6, 1979

PAY TO THE ORDER OF COMITE CAPANA GEORGE BUSH \$ 500.00**

DOLLARS

FIRST NATIONAL CITY BANK
 HATO REY, PUERTO RICO

ALMAC ENTERPRISES, INC.

George Bush
 NON-NEGOTIABLE

ALMAC ENTERPRISES, INC.

PLEASE DETACH BEFORE DEPOSITING BY ENDORSEMENT THE CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	OUR NUMBER	AMOUNT OF INVOICE	DEDUCTIONS	AMOUNT PAID

14 12 of 13

SILVER, INC.

P.O. BOX 11605
SANTURCE, P.R. 00910

VOUCHER NO. 53508

VOUCHER	REF NUMBER	INVOICE DATE	VENDOR NUMBER	INVOICE AMOUNT	DISCOUNT	AMOUNT PAID
						TOTAL ▶

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED ABOVE

SILVER, INC.

P.O. BOX 11605
SANTURCE, P.R. 00910

101-204
215

CHECK NO. 53508

DATE OF CHECK
MO DAY YR
9-06-79

DO LARS AND CENTS
EXACTLY \$500.00/100**

PAY ONLY THIS AMOUNT
\$ 500.00**

PAY TO THE ORDER OF

ON THE CAPITAL GROUP INC

SILVER, INC.

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

VENDOR FILE

pg 13



"B" 15 1 of 7
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gilda Julia
P. O. Box 11605
Santurce, Puerto Rico 00910

RE: MUR 1181

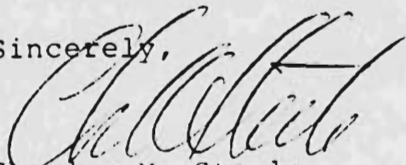
Dear Ms. Julia:

The Commission is in receipt of your April 30, 1980, letter wherein you respond to the questions enclosed in the Commission's letter of April 21, 1980. A review of your response raises an additional question that the Commission needs answered to complete its investigation.

Enclosed please find photocopies of twelve corporate checks issued to "Cuidadanos Pro Democracia". In your April 30, 1980 letter, you state that "no contributions were made to "Cuidadanos Pro Democracia," yet, as you can see from the photocopies, checks apparently signed by you were issued to Cuidadanos Pro Democracia. Would you please explain this apparent discrepancy?

If you have any questions concerning this matter, please contact Robert Bogin at (202) 523-4529. Thank you for your cooperation.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

GIRAFÁ, INC.
P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

pg 2 of 1

101-204
215

Nº 553

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

THE 500 00 DOLS 00 CTS

GIRAFÁ, INC.

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

[Handwritten Signature]

1:0215002040 047893811

SAN JUAN REALTY CORP.

P. O. BOX 11605
SANTURCE, P.R. 00910

Nº 168

101-204
215

September 6, 19 79

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

THE 500 00 DOLS 00 CTS



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

[Handwritten Signature]

1:0215002021 855173701411

INDUSTRIAL WAREHOUSE INC.

P. O. BOX 11605
SANTURCE, PUERTO RICO

101-204
215

Nº 900

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA DOLLARS \$ 500.00**

THE 500 00 DOLS 00 CTS

CIUDADANO PRO DEMOCRACIA

INDUSTRIAL WAREHOUSES INC.

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

[Handwritten Signatures]

1:0215002041: 024177511

ALMAC ENTERPRISES, INC.
P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

13 4 of 70

204
001642

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

500 00 00

DOLLARS

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

ALMAC ENTERPRISES, INC.

021502040484563

CITY ENTERPRISES, INC.
P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-204
215

NO 223

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

500 00 00

DOLLARS

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

CITY ENTERPRISES, INC.

021502040478746

LEASING & BROKERAGE, INC.
APARTADO 11605 SANTURCE 00910

520

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

September 6, 1979

PAY THE AMOUNT OF 500 00 00 TO THE ORDER OF \$ 500.00**

CIUDADANO PRO DEMOCRACIA

Leasing & Brokerage, Inc

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

021502040240680

GATEWAY PLAZA, INC.
P.O. BOX 11605
SANTURCE, P.R. 00910

19 69 7

No 1501

101-204
215

September 6, 19 79

PAY TO THE
ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

⑆0215⑆0204⑆0492088⑆

DOLLARS

CITIBANK

Citibank, N.A.

Hato Rey, P.R. 00918

Rafael Quiñones
Yolanda Julia

⑆0215⑆0204⑆0492088⑆

PUERTO NUEVO DEVELOPMENT CORP.
APARTADO 11605 SANTURCE 00910

2488

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

September 6, 19 79

PAY THE AMOUNT OF
TO THE ORDER OF:

⑆0215⑆0204⑆0478237⑆

\$ 500.00**

CIUDADANO PRO DEMOCRACIA

PUERTO NUEVO DEVELOPMENT CORP.

Rafael Quiñones
AUTHORIZED SIGNATURE
Yolanda Julia
AUTHORIZED SIGNATURE

⑆0215⑆0204⑆0478237⑆

TRIPLE A INVESTMENTS, INC.
P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-204
215

No

2

DATE September 6, 1979

⑆0215⑆0204⑆0239645⑆

DOLLARS \$ 500.00**

PAY
TO THE ORDER OF

CIUDADANO PRO DEMOCRACIA

TRIPLE A INVESTMENTS, INC.

Rafael Quiñones
Yolanda Julia

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

⑆0215⑆0204⑆0239645⑆



"C"

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

September 9, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gilda Julia
P. O. Box 11605
Santurce, P.R. 00910

RE: MUR 1181

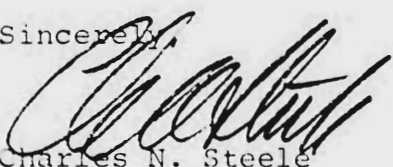
Dear Ms. Julia:

We are in receipt of your letter dated August 19, 1980, responding to the Commission's letter of June 11, 1980 wherein you enclosed original copies of checks which were issued to Comite Campana George Bush. The Commission appreciates you sending this information to its attention, nonetheless questions continue to arise concerning these contributions. In this regard, the Commission requests that you send the original cancelled checks which correspond to the copies of the checks which you enclosed in your letter of August 19, 1980. Specifically, the Commission requests that you send the following cancelled checks:

Gateway Plaza, Inc. - No. 1501
Puerto Nuevo Development Corp. - No. 2488
Triple A Investments, Inc. - No. 2
Puerto Nuevo Distribution Center, Inc. - No. 2225
Almac Enterprises, Inc. - No. 001642
City Enterprises, Inc. - No. 223
Leasing and Brokerage, Inc. - No. 520
Silver, Inc. - No. 53508
Girafa, Inc. - No. 553
San Juan Realty Corp. - No. 168
Industrial Warehouse Inc. - No. 990
Castle Enterprises, Inc. - No. 123

If you have any questions about this matter please telephone Robert Bogin at (202) 523-4000. Thank you for your cooperation.

Sincerely,


Charles N. Steele
General Counsel

MUR 1181

Bojin

"D"

PS 102

60 OCT 7 11:20

GILDA JULIÁ
P. O. Box 11605
SANTURCE, P. R. 00910

September 22, 1980

Mr. Charles N. Steele
General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

Dear Mr. Steele:

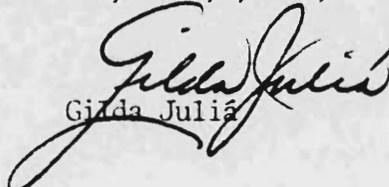
On May 10, 1980 I went to New York where I spent the Summer, having returned to Puerto Rico on August 9, 1980.

The cancelled checks were sent to me in New York and missed me by a few days. However, I went back to New York on August 28, 1980 and brought back with me an accumulation of papers which had gathered during the Summer, said checks included.

National Airlines, flight 249, September 5, 1980 refused to allow me to carry on board the box containing all my papers and checked same at the boarding gate. The box has been lost and I have been unsuccessfully trying for the last two weeks to trace it.

If it is found, I will immediately comply with your request as outlined in your letter of September 9, 1980.

Very truly yours,


Gilda Juliá

mm

CERTIFIED WITH RETURN
RECEIPT # P13 9473873

distribute copies to:
 1. (WHITE) - LOCAL FILE
 2. (GREEN) - OMA
 3. (GOLD) - (STATION CHARGED)

263291
 FILE NUMBER

National Airlines
MISHANDLED BAGGAGE REPORT
 SEE REGULATIONS

pg. 2 of 2

To MIALZ, distribute copies to:
 1. (WHITE) - MIALZ
 2. (GREEN) - GOMIA
 3. (GOLD) - LOCAL FILE

REPORTING STATION: **SSU** DATE REPORTED: **7/15/50** TIME: **8:15** AGENT NUMBER: **150** HOW REPORTED: BY LETTER CHECKED UNCHECKED
 IN PERSON BY PHONE REC'D FROM INTLINE PILFERED

PASSENGER'S NAME, INITIALS - MR., MRS., MISS: **JULIA, GILDA** SERIAL NO. (IF MILITARY): _____ TICKET NUMBER: **1007016473**

LOCAL POINT OF CONTACT - NUMBER AND STREET: **Box 10 Road Beach Estate, P.R.** CITY, STATE, ZIP CODE: _____ UNTIL: _____ AREA CODE AND PHONE NUMBER: **716-2588**

PERMANENT ADDRESS - NUMBER AND STREET (INCLUDE APO OR FPO): _____ CITY, STATE, ZIP CODE: _____ MO. DATE: _____ AREA CODE AND PHONE NUMBER: **(887172) pt.**

FORWARDING OR DELIVERY INSTRUCTIONS: _____ PREVIOUSLY REPORTED: NO YES AT: **1/1**

PASSENGER USED				BAGGAGE CHECKED				BAGGAGE TAGGED		EXACT LOCATION LAST SEEN (Hotel, Cab, Limo, City Terminal, Airport, Counter, Etc.)
FROM	TO	AIRLINE	FLIGHT/DATE	FROM	TO	AIRLINE	FLIGHT/DATE	AT AIRPORT	AT CITY TERMINAL	
JFK	MIA	NA	249	Bag	Chk	to		<input type="checkbox"/>	<input type="checkbox"/>	DESTINATION ON CLAIM CHECK
MIA	SSU	NA	872	Return	Only			<input type="checkbox"/>	<input type="checkbox"/>	
								<input type="checkbox"/> AS ON-LINE DEST.	<input type="checkbox"/> AS ON-LINE TRANSFER	IF CUSTOMS POINT INVOLVED, DID BAGGAGE CLEAR? <input type="checkbox"/> YES <input type="checkbox"/> NO
								<input type="checkbox"/> AS INTERLINE	<input type="checkbox"/> AS STANDBY	
								<input type="checkbox"/> BY PORTER		WHERE

TOTAL BAGS CHECKED: **1** WGT.: _____ TOTAL BAGS RECEIVED: **1** WGT.: _____ PICK UP CLAIM CHRS.: YES NO STAPLE ON BACK OF WHITE COPY: _____ IS THERE A RECORD OF TRANSFER TO NA? YES NO TRANSFER STUB RETAINED BY (CARRIER): _____

BAG TYPE: **BRN** COLOR: _____ CLAIM CHECK NUMBER: **949702** MFR. OR BRAND: _____ INITIALS MAPS TAGS, LABELS I.D. OTHER THAN PASSENGERS: **NO ID** AGENT VERIFYING RECORD: _____ DATE: _____

Baggage content: list outstanding items: **Misc** Adult Child Male Female Infant

Baggage content: list outstanding items: _____ Adult Child Male Female Infant

Baggage content: list outstanding items: _____ Adult Child Male Female Infant

Baggage content: list outstanding items: _____ Adult Child Male Female Infant

Baggage content: list outstanding items: _____ Adult Child Male Female Infant

Baggage content: list outstanding items: _____ Adult Child Male Female Infant

Claim Check Numbers of Articles NOT Missing or Pilfered: _____

Are There Any Unusual Or Suspicious Circumstances Concerning This Loss? YES NO (SEE OVER) **164362** SEE OVER

IF BAG NOT LOCATED And Loss Is Referred To MIALZ, Complete This Section: QUESTIONNAIRE MAILED ON: **1/1** CARD MAILED ON: **1/1** REMARKS: _____

BAGGAGE LOCATED AT: _____ WILL ARRIVE (M/D/Date): _____ EXPEDITE CHECK NRS: _____ REMARKS: _____

HOW AND WHEN DELIVERED TO PASSENGER: _____ TIME: _____ DATE: _____ MANAGER REVIEWING FILE: _____

MISHANDLING SUMMARY: _____ STATION CHARGED: _____ CATEGORY CHARGED: _____ (Use Approved Category Only) MGR. MAKING CATEGORY CHANGE: _____ REASON: _____

SEE OTHER SIDE FOR ADDITIONAL COMMENTS

contributions from corporations.

Q Mrs. Hilda Julia and Rios Slavins, do you know them?

A I don't know them.

Q Do you know of them?

A I know of them but I don't know them.

Q What do you know of them? Do they own corporations?

A Yes, they own several corporations. Mr. Slavins is here, I think he is the Honorary Consul from Peru or for Peru and his name is often in the newspapers but I know they own several corporations.

Q They are from Puerto Rico?

A Yes.

Q Do you know whether or not they contributed, their corporation contributed to Ciudadanos Pro Democracia?

A Personally, I do not.

MR. FAX: You did not solicit the money?

THE WITNESS: I did not solicit the money.

But I saw the checks.

BY MR. BOGIN:

Q Do you know who solicited them?

A That much I don't know.

Q So you don't know how they knew about

3171031005

1
2 Ciudadanos Pro Democracia?

3 A Exactly.

4 MR. FAX: Presumably.

5 THE WITNESS: It must have been somebody at
6 the meeting.

7 MR. PONDER: Excuse me. I would like to let
8 Mrs. De Vincenti answer the question, rather than
9 you helping her answer them.

10 MR. FAX: I am trying to assist in answering
11 some of the questions, in asking some of the
12 questions.

13 MR. PONDER: Before when you suggested to her
14 that she did not solicit the money. I would
15 rather you let her finish the answer and then if
16 you would like to ask a question later, fine.

17 THE WITNESS: I had already stated before that
18 I did not solicit anything. I sold three tickets
19 to my own family.

20 MR. PONDER: This has nothing to do with you
21 Mrs. Vincenti. We are talking about a procedural
22 problem.

23 BY MR. BOGIN:

24 Q You do not know how Slavin or Julia, in
25 their corporate capacity was able to make a contribution to

3171013106

1
2 Ciudadanos Pro Democracia?

3 A I don't know personally.

4 Q But you saw the check?

5 A I saw the checks.

6 Q Who showed you the checks?

7 A They were there with a few of the checks that
8 came in.

9 Q They came in through the mail?

10 A They were given at the meetings.

11 Q And handed to you?

12 A Placed on a table.

13 Q Then what happened to these checks or this
14 check that were written out, were they written out to
15 Ciudadanos Pro Democracia?

16 A Yes, sir.

17 Q Then, after you saw the checks, what
18 happened to them? Do you know what happened to these checks?

19 A Then when the checks were there at a general
20 meeting, the idea came up that inasmuch as the money had
21 been solicited for George Bush and for purposes for
22 education, we should send the money to the George Bush for
23 president committee. Again it was a thought that came up
24 in the meeting.

25 Q Okay. So did you then send that check over

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to George Bush for president committee?

A Oh no, those checks were never sent to him as such.

Q What happened with those checks?

A Again I have to come back to Puerto Rican politics.

Q Instead of getting back to that, I would like to follow through with this line of thought.

A It is within what I am trying to say. The fact that we had gotten money which was not either marked specifically for anything, could be used as we saw fit, even though the explanations given when the checks were returned should have been and I say should have been, because I wasn't present when they were given, that we could not accept corporate money.

Somebody from the floor said, "Why don't we take these checks and make out either money orders or cashier's checks and send them in our different names to the George Bush for president committee."

That idea came from the floor and everybody immediately raised their hands and said, "Sure, I will sign. I will sign."

Q So all these corporate checks were changed to money orders?

3171019103

10 5 of 5

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A All those that were there at the time were changed to money orders.

Q And then sent to the George Bush for president committee?

A Yes.

Q With a contributor card?

A Whoever signed the money order would send the contributor's card.

Q And those contributor cards were people that were present at those meetings?

A Right.

Q Nobody else?

A Nobody else.

Q Did anybody question the fact that since George Bush for president committee could not accept corporate checks in the first place, that this procedure was all right?

A Nobody questioned the fact because as I said, we were going under the same assumption that what was being done is correct. We get money for X committee and they say you can do as you please with that money, then we can either apportion it and use some for propaganda, for one person, nobody, absolutely. There was absolutely no intention, no malice going behind or under the law.

31703377

CASTLE ENTERPRISES, INC.
P. O. BOX 11605
SANTURCE, P.R. 00310

NO 123

101-202
215

September 6, 19 79

PAY TO THE
ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

FIVE HUNDRED DOLLARS

DOLLARS



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

[Handwritten signature]
[Handwritten signature]

⑆0215⑆0202⑆ 859⑆145762⑆

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

⑆0215⑆0204⑆ 0476269⑆

AUTHORIZED SIGNATURE

pg 3 of 7

SILVER, INC.

P.O. BOX 11605
SANTURCE, P.R. 00910

3 1 7 1 0 1 3 5 0 0 1

101-204
216

CHECK NO. 10748

9-06-79

DOLLARS AND CENTS
EXACTLY \$500.00/100**

\$ 500.00**

SILVER, INC.

[Signature]
AUTHORIZED SIGNATURE
AUTHORIZED SIGNATURE

PAY TO THE ORDER OF
CIUDADANO PRO. DEMOCRACIA

FIRST NATIONAL CITY BANK
SANTURCE, P.R.

⑆0215⑆0204⑆ 0476269⑆

15.5 dbr

PUERTO NUEVO DISTRIBUTION CENTER, INC.

No 2225

P.O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-204
215

September 6, 19 79


PAY TO THE
ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

Five Hundred 00/100 DOLLARS 00/100 CTS

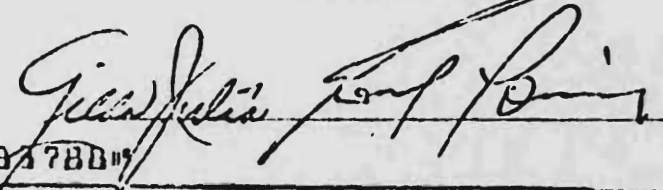
DOLLARS

CITIBANK 

Citibank, N.A.

Hato Rey, P. R. 00218

PUERTO NUEVO DISTRIBUTION CENTER, INC.



⑆021502040⑆ 0487788⑈

AUTHORIZED SIGNATURE

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

⑆021502040⑆ 0476269⑈

PS 767

RECEIVED

80 OCT 7 11:20

000 # 2896

GILDA JULIA
P. O. Box 11605
SANTURCE, P. R. 00910

September 22, 1980

Mr. Charles N. Steele
General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

Dear Mr. Steele:

On May 10, 1980 I went to New York where I spent the Summer, having returned to Puerto Rico on August 9, 1980.

The cancelled checks were sent to me in New York and missed me by a few days. However, I went back to New York on August 28, 1980 and brought back with me an accumulation of papers which had gathered during the Summer, said checks included.

National Airlines, flight 249, September 5, 1980 refused to allow me to carry on board the box containing all my papers and checked same at the boarding gate. The box has been lost and I have been unsuccessfully trying for the last two weeks to trace it.

If it is found, I will immediately comply with your request as outlined in your letter of September 9, 1980.

Very truly yours,

Gilda Julia
Gilda Julia

mm

CERTIFIED WITH RETURN
RECEIPT # P18 9473873

WHEN BAG IS LOCATED, distribute copies to:

- 1 (WHITE) - LOCAL FILE
- 2 (GREEN) - GOMIA
- 3 (GOLD) - LOCAL FILE

263291
FILE NUMBER

National Airlines

MISHANDLED BAGGAGE REPORT

SEE REGULATIONS

IF BAG NOT LOCATED And Loss Is Referred To MIALZ, distribute copies to:

- 1 (WHITE) - MIALZ
- 2 (GREEN) - GOMIA
- 3 (GOLD) - LOCAL FILE

REPORTING STATION: STJ DATE REPORTED: 9/13/50 TIME: 8-45 AGENT NUMBER: 130 HOW REPORTED: BY LETTER CHECKED UNCHECKED PILFERED

IN PERSON BY PHONE REC'D FROM INTLINE

PASSENGER'S NAME, INITIALS - MR., MRS., MISS: J.P.A. G. 102 SERIAL NO. (IF MILITARY): _____ TICKET NUMBER: 1002616413

LOCAL POINT OF CONTACT - NUMBER AND STREET: Box 10 Road Brook Estates, Duval P.P. CITY, STATE, ZIP CODE: _____ UNFD: _____ AREA CODE AND PHONE NUMBER: 776-2588

PERMANENT ADDRESS - NUMBER AND STREET (INCLUDE APO OR FPO): _____ CITY, STATE, ZIP CODE: _____ MO. DATE: _____ AREA CODE AND PHONE NUMBER: 288-1155 pt.

FORWARDING OR DELIVERY INSTRUCTIONS: _____ PREVIOUSLY REPORTED: NO YES AT: _____ DATE: 1/1

PASSENGER USED				BAGGAGE CHECKED				BAGGAGE TAGGED		EXACT LOCATION LAST SEEN (Hotel, Cab, Limo, City Terminal, Airport, Counter, Etc.)
FROM	TO	AIRLINE	FLIGHT/DATE	FROM	TO	AIRLINE	FLIGHT/DATE	AT AIRPORT	AT CITY TERMINAL	
<u>JT</u>	<u>WIA</u>	<u>NA</u>	<u>249</u>	<u>Sept</u>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	DESTINATION ON CLAIM CHECK: _____ IF CUSTOMS POINT INVOLVED, DID BAGGAGE CLEAR? <input type="checkbox"/> YES <input type="checkbox"/> NO WHERE: _____
								<input type="checkbox"/>	<input type="checkbox"/>	
<u>W</u>	<u>STJ</u>	<u>NA</u>	<u>872</u>	<u>3/18</u>				<input type="checkbox"/>	<input type="checkbox"/>	
								<input type="checkbox"/>	<input type="checkbox"/>	
								<input type="checkbox"/>	<input type="checkbox"/>	
								<input type="checkbox"/>	<input type="checkbox"/>	

TOTAL BAGS CHECKED: 1 WGT. _____ TOTAL BAGS RECEIVED: 1 WGT. _____ PICK UP CLAIM CHAS. YES NO STAPLE ON BACK OF WHITE COPY: _____ IS THERE A RECORD OF TRANSFER TO NA? YES NO TRANSFER STUB RETAINED BY (CARRIER): _____

BAG TYPE: NA COLOR: BRN CLAIM CHECK NUMBER: 949702 MFR. OR BRAND: _____ INITIALS MARKS TAGS LABELS I.D. OTHER THAN PASSENGERS: NO ID AGENT VERIFYING RECORD: _____ DATE: _____

Baggage content: list outstanding items _____ Adult Child Male Female Infant
None

Baggage content: list outstanding items _____ Adult Child Male Female Infant

Baggage content: list outstanding items _____ Adult Child Male Female Infant

Baggage content: list outstanding items _____ Adult Child Male Female Infant

Are There Any Unusual Or Suspicious Circumstances Concerning This Loss? YES NO (SEE OVER) I.D. DOCUMENTS (DESCRIBE): 50164362 SEE OVER

IF BAG NOT LOCATED And Loss Is Referred To MIALZ, Complete This Section. QUESTIONNAIRE MAILED ON: 1/1 CARD MAILED ON: 1/1 REMARKS: _____ MGR. NTC. _____

BAGGAGE LOCATED AT: _____ WILL ARRIVE (FM Date): _____ EXPEDITE CHECK NBR: _____ REMARKS: _____

HOW AND WHEN DELIVERED TO PASSENGER: _____ TIME DATE: _____ MANAGER REVIEWING FILE: _____

MISHANDLING STATION CHARGED: _____ CATEGORY CHARGED: _____ (Use Approved Category Only) MGR. MAKING CATEGORY CHARGE: _____ REASON: _____

SEE OTHER SIDE FOR ADDITIONAL COMMENTS

GILDA JULIÁ

P. O. Box 11605

SANTURCE, P. R. 00910

RECEIVED

80-OCT 7 11:20

CERTIFIED

P18 3473673

MAIL

Mr. Charles N. Steele
General Counsel
FEDERAL ELECTION COMMISSION
Washington D.C. 20463

AIR MAIL

RETURN RECEIPT
REQUESTED

500187013

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3
Add your address in the "RETURN TO" space on reverse

1 The following service is requested (check one).
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY
 Show to whom and date delivered
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO:
Hilda Julia

3 ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
see 910
 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
Ismael Feliciano

4 DATE OF DELIVERY POSTMARK
 SEP 18 1980
 P.R. DEPT. OF COMMERCE
 SAN JUAN, P.R.

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE:

☆ GPO: 1978-272-942

Muk 1181 - Bogin



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 9, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gilda Julia
P. O. Box 11605
Santurce, P.R. 00910

RE: MUR 1181

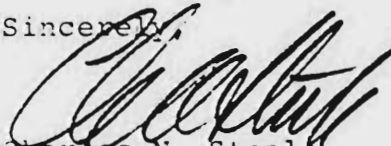
Dear Ms. Julia:

We are in receipt of your letter dated August 19, 1980, responding to the Commission's letter of June 11, 1980 wherein you enclosed original copies of checks which were issued to Comite Campana George Bush. The Commission appreciates you sending this information to its attention, nonetheless questions continue to arise concerning these contributions. In this regard, the Commission requests that you send the original cancelled checks which correspond to the copies of the checks which you enclosed in your letter of August 19, 1980. Specifically, the Commission requests that you send the following cancelled checks:

Gateway Plaza, Inc. - No. 1501
Puerto Nuevo Development Corp. - No. 2488
Triple A Investments, Inc. - No. 2
Puerto Nuevo Distribution Center, Inc. - No. 2225
Almac Enterprises, Inc. - No. 001642
City Enterprises, Inc. - No. 223
Leasing and Brokerage, Inc. - No. 520
Silver, Inc. - No. 53508
Girafa, Inc. - No. 553
San Juan Realty Corp. - No. 168
Industrial Warehouse Inc. - No. 990
Castle Enterprises, Inc. - No. 123

If you have any questions about this matter please telephone Robert Bogin at (202) 523-4000. Thank you for your cooperation.

Sincerely,


Charles N. Steele
General Counsel

100-#
2/138

100-1181

RECEIVED

GILDA JULIÁ
P. O. Box 11605
SANTURCE, P. R. 00910

80 AUG 25 P12:46

August 19, 1980

Mr. Charles N. Steele
General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

Dear Mr. Steele:

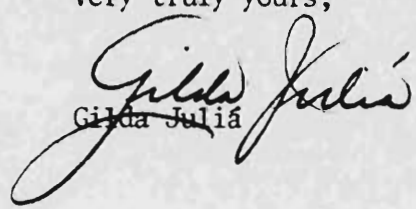
I acknowledge receipt of your letter dated June 11, 1980. However, I was away all Summer and did not have access to my files until I returned to Puerto Rico on the 9th. of August.

Enclosed please find the original copies of the checks which were issued to Comité Campaña George Bush.

I have no idea why the photocopies which you have enclosed seem to have been issued to Ciudadanos Pro Democracia.

Please return my original copies as soon as you have completed your examination.

Very truly yours,


Gilda Juliá

mm

Enclosures

CERTIFIED WITH RETURN
RECEIPT REQUESTED # P27 3254778

80 : 8 - 52505 0

June 16, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1181

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis. Thank you.

317101910000

RECEIVED

902121

80 JUL 16 PM 1:31

(100# 1956)

LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

TELEPHONE (202) 624-8800

CABLE ADDRESS

"CHADUP"

TELEX NUMBER 89-2798

OSCAR L. CHAPMAN
(1896-1978)

NORMAN S. PAUL
(1919-1978)

COUNSEL
EUGENE T. HERBERT

SAN JUAN P. R. OFFICE
SUITE 504
PAN AMERICAN BUILDING
HATO REY, PUERTO RICO 00917
TELEPHONE (809) 756-5454

RAFAEL A. GEIGEL
RESIDENT ASSOCIATE

WRITER'S DIRECT DIAL NUMBER

WILLIAM R. DUFF
PAUL A. LENZINI
GENE PERRY BOND
JAMES S. HOSTETLER
LUIS GUINOT, JR.
W. N. HARRELL SMITH
ALBERT D. STURTEVANT
CARL W. ULRICH
CHARLES S. FAX
CHERYL C. BURKE
JOEL L. GREENE
ROBERT P. MURPHY
MICHAEL A. KELLY
JOSEPH J. ZIMMERMAN
LYNDA TROUTMAN O'SULLIVAN
WILLIAM A. HUTCHINS
NEAL J. TONKEN
BARBARA E. SCHNEIDER

July 14, 1980

Charles N. Steele, General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1181 (80)

Dear Mr. Steele:

Thank you for your letter of July 8, 1980, received in this office on July 11, 1980. In your letter, you have requested that we respond to your proposal within ten days. We have been unable to reach Mrs. de Vincenti to discuss the proposal with her, as she is presently traveling outside of Puerto Rico. Nor do we know the date on which she will be returning to her home. Accordingly, this is to request, at a minimum, an additional ten days, up to and including July 31, 1980, in which to respond to your proposal. In the event that we are unable to counsel with Mrs. de Vincenti in sufficient time to permit us to meet the July 31, 1980, deadline, we will be in immediate contact with your office.

We are very appreciative of your consideration in this matter.

Very truly yours,

Charles S. Fax

cc: Robert Bogin, Esq.
Office of General Counsel
Federal Election Commission

Rafael A. Giegel

CSF:pam

01:32 91700 07

7890123456

LAW OFFICES
CHAPMAN, DUFF AND PAUL
1730 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006



ALWAYS USE
ZIP CODE

Charles N. Steele, General Counsel
Federal Election Commission
Washington, D. C. 20463

80 JUL 15 AM 1:31

RECEIVED

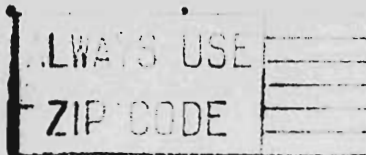
110110118

LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006



Robert Bogin, Esquire
Office of General Counsel
Federal Election Commission
Washington, D. C. 20463

80 JUL 16 PM 1:31

RECEIVED

310000013

PS Form 3811, Aug 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check appropriate box):

REGISTERED MAIL —

Show to whom and date delivered —

Show to whom, date, and address of delivery —

RESTRICTED DELIVERY —

Show to whom and date delivered —

RESTRICTED DELIVERY —

Show to whom, date, and address of delivery —

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
Charles S. Fox

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>625-523</i>	

(Always obtain signature of addressee or agent)

I have received the article described above

SIGNATURE Addressee Authorized agent

J. Smith

4. DATE OF DELIVERY *JUL 1 1980* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

GPO: 1978-272-362

MUR 1181 - Bosin



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 8, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles S. Fax
Chapman, Duff and Paul
1730 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

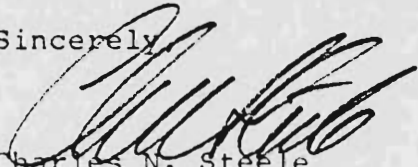
RE: MUR 1181 (80)

Dear Mr. Fax:

In response to your letter of April 20, 1980, expressing a desire to settle this matter informally, please find enclosed a conciliation agreement this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please have it signed and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make the check for the civil penalty payable to the United States Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Robert Bogin, the attorney assigned to this matter, at 523-4529.

Sincerely,


Charles N. Steele
General Counsel

cc: Rafael A. Geigel
Julita R. de Vincenti

Enclosure
Conciliation Agreement



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles S. Fax
Chapman, Duff and Paul
1730 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1181 (80)

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If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Robert Bogin, the attorney assigned to this matter, at 523-4529.

Sincerely,

Charles N. Steele
General Counsel

cc: Rafael A. Geigel
Julita R. de Vincenti

Enclosure
Conciliation Agreement

RB
7/8/80



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 JUN 16 P12: 12

June 16, 1980

MEMORANDUM

To: The Commission

FROM: Charles N. Steele *CNS*
General Counsel

SUBJECT: Proposed Informal Conciliation Agreement
MUR 1181

On April 21, 1980, the Office of General Counsel received a letter from counsel for respondent Julita Rivera de Vincenti that indicates a desire to enter into negotiations directed towards reaching a conciliation agreement. (attached). Thus, pursuant to 11 C.F.R. § 111.18(d), attached is a proposed conciliation agreement that this Office recommends the Commission authorize be sent to respondents. The proposed conciliation agreement contains admissions of violations and a civil penalty.

Recommendation

Approve the proposed conciliation agreement and authorize the General Counsel to send the attached letter to respondents.

Attachments: Letter from counsel
Proposed conciliation agreement
Letter to Respondent's counsel

3179313

LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

TELEPHONE (202) 624-8800

CABLE ADDRESS

"CHADUP"

TELEX NUMBER 89-2798

April 21, 1980

WILLIAM R. DUFF
PAUL A. LENZINI
GENE PERRY BOND
JAMES S. HOSTETLER
LUIS GUINOT, JR.
W. N. HARRELL SMITH
ALBERT D. STURTEVANT
CARL W. ULRICH
CHARLES S. FAX
CHERYL C. BURKE
JOEL L. GREENE
ROBERT P. MURPHY
MICHAEL A. KELLY
JOSEPH J. ZIMMERMAN
LYNDA TROUTMAN O'SULLIVAN
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NEAL J. TONKEN
BARBARA E. SCHNEIDER

OSCAR L. CHAPMAN
(1898-1978)
NORMAN S. PAUL
(1919-1978)

COUNSEL
EUGENE T. HERBERT
SAN JUAN P. R. OFFICE
SUITE 504
PAN AMERICAN BUILDING
HATO REY, PUERTO RICO 00917
TELEPHONE (809) 756-5454

RAFAEL A. GEIGEL
RESIDENT ASSOCIATE

WRITER'S DIRECT DIAL NUMBER

(202) 624-8831

CONFIDENTIAL

PI2: 24

Robert Bogin, Esquire
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Federal Election Commission
Investigation of Possible
Violations of 2 U.S.C §441b
and §441f by Dona Julia
Rivera de Vincenti

Dear Mr. Bogin:

This firm represents Dona Julia Rivera de Vincenti (hereinafter "Dona Julita") in the above-captioned matter. This letter is submitted in accordance with the provisions of 2 U.S.C. §437g(a)(4) and 11 C.F.R. §111.4. We understand that Robert P. Visser, Esquire, General Counsel to the George Bush for President Committee, by letter dated January 25, 1980 to Charles N. Steele, General Counsel to the Federal Election Commission (hereinafter "FEC"), provided information concerning certain fund-raising efforts on behalf of Mr. Bush undertaken by the Comite Pro Campana George Bush (hereinafter "the Comite"), and its chairperson, Dona Julita, in conjunction with the recent presidential primary election campaign in Puerto Rico. We understand further that on February 26, 1980, the FEC found reason to believe, based on the contents of that letter, that Dona Julita may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended (hereinafter, "the Act"), specifically, 2 U.S.C. §441b and §441f.

By letter dated January 29, 1980, the FEC notified Dona Julita of its findings. Thereafter, on March 19 and 20, 1980, the FEC took the sworn testimony of Dona Julita and two of her subordinates, Mr. Rafael Fuentes and Ms. Polly Alemany. This firm represented each of the three witnesses at their depositions. The discussion that follows

210:3:013

CHAPMAN, DUFF AND PAUL
Robert Bogin, Esquire
April 21, 1980
Page Two

below is derived primarily from their deposition transcripts and information obtained during private interviews of the three witnesses. Secondary reliance is placed on certain information provided in Mr. Visser's letter, itself substantially a product of interviews with Dona Julita.

The material facts giving rise to this investigation are undisputed. Citizens of Puerto Rico are not entitled to vote in the quadrennial presidential election held in the United States. As a result, until recently, there was no Puerto Rican citizen participation to speak of in the presidential campaign, and no systematic effort made by presidential candidates to attract support from the Puerto Rican populace at large. In 1979, for the first time, both the Republican and Democratic parties determined to hold presidential primaries in Puerto Rico, notwithstanding the inability of Puerto Rican citizens to participate in the general election. However limited in its scope or import, this event presented the first opportunity for large numbers of Puerto Ricans to involve themselves in a national political campaign.

Puerto Rican politics is heavily dominated by the issue of statehood. A candidate for national political office who takes a position on the issue of Puerto Rican statehood can expect to obtain support in Puerto Rico from that political faction that maintains the same view, largely irrespective of his position on other issues. George Bush has taken a strong stand in favor of statehood, and has thus attracted the active support of Commonwealth citizens who themselves favor statehood for Puerto Rico.

Dona Julia Rivera de Vincenti is a distinguished public citizen of the Commonwealth of Puerto Rico and a strong advocate of Puerto Rican statehood. Dona Julita, as she is universally known, is a graduate of New York University with advanced degrees from Columbia and Cornell Universities. A professor of labor law at the University of Puerto Rico, in 1968 Dona Julita was appointed Secretary of Labor of the Commonwealth of Puerto Rico, the first woman to achieve cabinet rank in the Commonwealth government. She served in that position until 1972. In 1974 she was appointed by President Nixon as an alternate delegate to the United Nations, the first Puerto Rican ever named to the United States Mission. Currently, Dona Julita serves as Administrator of the State Insurance Fund for the Commonwealth of Puerto Rico, a cabinet-level position to which she was appointed by Governor Carlos Romero Barcelo.

CHAPMAN, DUFF AND PAUL

Robert Bogin, Esquire
April 21, 1980
Page Three

Politically active for all of her adult life, and as noted above, an outspoken proponent of statehood, Dona Julita was asked in 1979 to chair the Comite Pro Compana George Bush in Puerto Rico. She accepted the position, and in the summer of 1979 began organizing campaign activities leading to the Republican Party presidential preference primary in Puerto Rico, scheduled for February 17, 1980.

3 1 7 1 0 : 3 3 0 1 7

In reaching an understanding of the campaign fund-raising activities undertaken by the Comite under the general direction of Dona Julita, five points must be noted. First, the Comite viewed the primary campaign not only as a means to develop support for George Bush, but equally important, as an opportunity to educate the Puerto Rican populace with respect to the issue of statehood. Second, the Federal Election Campaign Act of 1971, as amended, does not apply to municipal and Commonwealth-wide elections held in Puerto Rico; the presidential primaries in 1980 marked the first time that the requirements of the Act were applied to the political contributions of Puerto Rican citizens in a Commonwealth campaign. Third, the Comite lacked a finance chairman during the crucial period when actions currently under investigation by the FEC took place. The Comite had no finance chairman simply because it had been unable to find a qualified person prepared to serve, notwithstanding efforts to locate such a person. Fourth, although Dona Julita had broad political experience in Commonwealth-wide political campaigns, she had no financial experience as such and accordingly was placed in the awkward position of responsibility for fund-raising activities without direct experience in such activities. And, fifth, it was quite natural that the highly politicized Puerto Rican citizens who participated in the first presidential primaries ever held in Puerto Rico would apply to the presidential campaign the experience that they had obtained throughout numerous Commonwealth political campaigns.

The central facts concerning the Comite's questionable fund-raising activities are detailed in Mr. Visser's letter, based on his interviews with Dona Julita, and are recounted as well in Dona Julita's deposition. In summary form, they are as follows: In the late summer of 1979 it was determined that the Comite would sponsor a cocktail party for George Bush in order to raise funds. Although corporations were not solicited for tickets to the cocktail party, several corporate checks were received. This was not determined at the outset to be unusual or illegal, as Commonwealth law permits corporate contributions to political campaigns, and indeed corporations in the Commonwealth have long participated in Commonwealth-wide election

CHAPMAN, DUFF AND PAUL

Robert Bogin, Esquire
April 21, 1980
Page Four

campaigns. Upon learning at a Comite meeting (attended by between thirty and fifty people) that corporate checks had been received, Mr. Anthony Rodriguez, an attorney and President of the Comite (but not finance chairman) advised that Federal law prohibited the making or receipt of corporate contributions. The corporate checks were thereupon returned to their makers.

3 1 7 1 0 2 3 1 0 1 0

At a subsequent meeting during this period at which Mr. Rodriguez was not in attendance, the idea arose from the floor to create another committee to be named the Ciudadanos Pro Democracia ("Citizens for Democracy", hereinafter "CPD"). It should be noted that there were between thirty to fifty people attending this meeting, and any member of the public interested in working for the candidacy of George Bush was invited to attend such meeting. The CPD was to be used as a multi-purpose vehicle, chiefly for political education on the issue of statehood and also to assist the candidacy of George Bush. Again, it should be emphasized that the proliferation of various committees with various responsibilities is common practice in Puerto Rican politics. Since the CPD was deemed to be a separate entity from the Comite Pro Campana George Bush, and since it had a multi-purpose charter, including political education on the issue of statehood, it was deemed appropriate to solicit corporate contributions to fund the activities of this committee. As Mr. Rodriguez was not in attendance when this decision was made, and Dona Julita's financial experience and understanding of the Act were virtually nil, objection was not made to this decision. It is obvious, however, that there was no effort to conceal the committee's plans, because the decision to solicit corporate funds from those corporations whose previous checks had been returned was arrived at in open session among thirty to fifty people. Subsequently a savings account was opened by Mr. Rafael Fuentes and Ms. Polly Alemany, two subordinates of Dona Julita at the State Insurance Fund, in the name of the CPD. Further, various attendees at the meeting, not including Dona Julita, solicited corporate funds as contributions to the CPD.

The CPD was of the view that funds solicited as contributions to the CPD could be used in any manner it saw fit, in furtherance of its general political aims. Accordingly, these contributions were not deemed to be contributions to George Bush, as such, but rather contributions to the CPD. Again, this is wholly consistent with longstanding Puerto Rican practice, where citizens and corporations are solicited for contributions to political committees, with the understanding that each committee, in the exercise of its discretion, will use the funds

CHAPMAN, DUFF AND PAUL

Robert Bogin, Esquire

April 21, 1980

Page Five

in any manner it sees fit, including but not limited to direct contributions, expenses and general political propaganda.

Having solicited and received these contributions the CPD determined to use these monies as political contributions to the George Bush campaign. As stated above, in the view of the CPD, these were CPD contributions to George Bush, rather than corporate contributions to Bush being funneled through the CPD, since the funds had been solicited and received by the CPD with no express conditions placed upon their usage. Accordingly, the CPD did not deem its contributions to George Bush to be illegal corporate contributions. Moreover, the CPD did not see a need to identify corporations as the ultimate source of the funds, as in CPD's view the source of the funds was the CPD itself. Finally, as the CPD knew that corporate contributions to George Bush were illegal, the mechanism of utilizing the CPD as the solicitor of such contributions was deemed to be the only legal means of avoiding the proscription.

Two additional features of the procedure utilized in making these contributions require explication - the usage of money orders and the identification of individuals as the source of the contributions. The usage of money orders is readily explained by the fact that the CPD held a savings account rather than a checking account. Thus, simply as a matter of mechanics, it was easier to convert the corporate checks into money orders, rather than deposit the checks in the savings account and then request the issuance of bank checks. Concerning the identification of individuals as the source of the contributions, although the testimony is ambiguous in this regard, information has been developed in private interviews that explains the rationale for this. As noted above, thirty to fifty people were active in the Comite. In the main, theirs was not a financial contribution. Rather, these people performed the many necessary ministerial tasks required for a successful campaign, from fund-raising and organizing the cocktail party, to licking stamps, stuffing envelopes and the like. Identifying some of these "foot soldiers" as contributors of what were thought to be CPD monies was deemed to be a means of recognition of their efforts. Again, as the CPD thought the money to be its own, it felt it had the discretion to designate certain worthy committee members as the contributors.

Two themes emerge from the foregoing chronology of events. First, it seems apparent that the Comite and the CPD did not undertake all reasonable efforts to insure that their conduct

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CHAPMAN, DUFF AND PAUL

Robert Bogin, Esquire

April 21, 1980

Page Six

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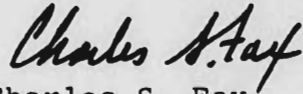
comported with the requirements of the Act. Second, it is clear that there was no criminal intent involved in their conduct, and that the Comite, the CPD, and Dona Julita, as the chairperson, acted openly, in above-board fashion, and in conformity with longstanding political practice in Puerto Rico. All decisions concerning establishment of the CPD and solicitation of corporate funds were reached at open meetings attended by thirty to fifty people. When the Bush campaign committee in Houston raised questions about the financial practices of the Comite, Dona Julita met with Mr. Visser and candidly reviewed all of the facts. No attempt was ever made to conceal any of the information concerning the financial practices of the Comite or the CPD. In the course of this investigation, when Dona Julita's deposition was noticed, she readily waived her Fifth Amendment privilege and testified on the record concerning her conduct and the practices of the Comite and the CPD. This was done after advice of counsel to the effect that certain of her testimony might evidence violations of the Act and might arguably give rise to the potential for criminal prosecution.

The questions before the Federal Election Commission are whether violations of the Act have occurred and if so, what sanctions should be imposed. While the facts appear to support a finding that technical violations did indeed occur, there is no ground for the initiation of criminal proceedings, in light of the circumstances delineated above. Moreover, the mitigating factors discussed above suggest that, at most, a modest civil penalty should be assessed. Dona Julita has devoted her life to public service in the government of Puerto Rico and is not a person of financial means. There is absolutely no indication that the monies collected on behalf of the George Bush campaign were used for anything but the purposes for which they were solicited, namely political activities and political contributions. Indeed, all but \$500.00 of the funds collected on behalf of the CPD have been accounted for, and our information is that the remaining monies were used for expenses incidental to the political work that was done. There is no question of bad faith on the part of Dona Julita or the campaign organization that she supervised. Nor is there any risk that this kind of oversight will occur again on her part. Coming to the end of a long career in Puerto Rican public service and politics, damage enough will be done to Dona Julita by the mere exposure of the events surrounding this investigation. A significant financial penalty, in light of these facts, is simply unwarranted.

CHAPMAN, DUFF AND PAUL
Robert Bogin, Esquire
April 21, 1980
Page Seven

Thank you for the opportunity to present our views. If the FEC has any questions concerning these matters please feel free to contact me at my office.

Very truly yours,



Charles S. Fax
Counsel for Dona
Julia Rivera de Vincenti

CSF:btf

3100033003



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles S. Fax
Chapman, Duff and Paul
1730 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1181 (80)

Dear Mr. Fax:

In response to your letter of April 20, 1980, expressing a desire to settle this matter informally, please find enclosed a conciliation agreement this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please have it signed and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make the check for the civil penalty payable to the United States Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Robert Bogin, the attorney assigned to this matter, at 523-4529.

Sincerely,

Charles N. Steele
General Counsel

cc: Rafael A. Geigel
Julita R. de Vincenti

Enclosure
Conciliation Agreement

CHAPMAN, DUFF AND PAUL

Robert Bogin, Esquire
April 21, 1980
Page Three

Politically active for all of her adult life, and as noted above, an outspoken proponent of statehood, Dona Julita was asked in 1979 to chair the Comite Pro Compana George Bush in Puerto Rico. She accepted the position, and in the summer of 1979 began organizing campaign activities leading to the Republican Party presidential preference primary in Puerto Rico, scheduled for February 17, 1980.

In reaching an understanding of the campaign fund-raising activities undertaken by the Comite under the general direction of Dona Julita, five points must be noted. First, the Comite viewed the primary campaign not only as a means to develop support for George Bush, but equally important, as an opportunity to educate the Puerto Rican populace with respect to the issue of statehood. Second, the Federal Election Campaign Act of 1971, as amended, does not apply to municipal and Commonwealth-wide elections held in Puerto Rico; the presidential primaries in 1980 marked the first time that the requirements of the Act were applied to the political contributions of Puerto Rican citizens in a Commonwealth campaign. Third, the Comite lacked a finance chairman during the crucial period when actions currently under investigation by the FEC took place. The Comite had no finance chairman simply because it had been unable to find a qualified person prepared to serve, notwithstanding efforts to locate such a person. Fourth, although Dona Julita had broad political experience in Commonwealth-wide political campaigns, she had no financial experience as such and accordingly was placed in the awkward position of responsibility for fund-raising activities without direct experience in such activities. And, fifth, it was quite natural that the highly politicized Puerto Rican citizens who participated in the first presidential primaries ever held in Puerto Rico would apply to the presidential campaign the experience that they had obtained throughout numerous Commonwealth political campaigns.

The central facts concerning the Comite's questionable fund-raising activities are detailed in Mr. Visser's letter, based on his interviews with Dona Julita, and are recounted as well in Dona Julita's deposition. In summary form, they are as follows: In the late summer of 1979 it was determined that the Comite would sponsor a cocktail party for George Bush in order to raise funds. Although corporations were not solicited for tickets to the cocktail party, several corporate checks were received. This was not determined at the outset to be unusual or illegal, as Commonwealth law permits corporate contributions to political campaigns, and indeed corporations in the Commonwealth have long participated in Commonwealth-wide election

CHAPMAN, DUFF AND PAUL

Robert Bogin, Esquire
April 21, 1980
Page Four

campaigns. Upon learning at a Comite meeting (attended by between thirty and fifty people) that corporate checks had been received, Mr. Anthony Rodriguez, an attorney and President of the Comite (but not finance chairman) advised that Federal law prohibited the making or receipt of corporate contributions. The corporate checks were thereupon returned to their makers.

At a subsequent meeting during this period at which Mr. Rodriguez was not in attendance, the idea arose from the floor to create another committee to be named the Ciudadanos Pro Democracia ("Citizens for Democracy", hereinafter "CPD"). It should be noted that there were between thirty to fifty people attending this meeting, and any member of the public interested in working for the candidacy of George Bush was invited to attend such meeting. The CPD was to be used as a multi-purpose vehicle, chiefly for political education on the issue of statehood and also to assist the candidacy of George Bush. Again, it should be emphasized that the proliferation of various committees with various responsibilities is common practice in Puerto Rican politics. Since the CPD was deemed to be a separate entity from the Comite Pro Campana George Bush, and since it had a multi-purpose charter, including political education on the issue of statehood, it was deemed appropriate to solicit corporate contributions to fund the activities of this committee. As Mr. Rodriguez was not in attendance when this decision was made, and Dona Julita's financial experience and understanding of the Act were virtually nil, objection was not made to this decision. It is obvious, however, that there was no effort to conceal the committee's plans, because the decision to solicit corporate funds from those corporations whose previous checks had been returned was arrived at in open session among thirty to fifty people. Subsequently a savings account was opened by Mr. Rafael Fuentes and Ms. Polly Alemany, two subordinates of Dona Julita at the State Insurance Fund, in the name of the CPD. Further, various attendees at the meeting, not including Dona Julita, solicited corporate funds as contributions to the CPD.

The CPD was of the view that funds solicited as contributions to the CPD could be used in any manner it saw fit, in furtherance of its general political aims. Accordingly, these contributions were not deemed to be contributions to George Bush, as such, but rather contributions to the CPD. Again, this is wholly consistent with longstanding Puerto Rican practice, where citizens and corporations are solicited for contributions to political committees, with the understanding that each committee, in the exercise of its discretion, will use the funds

CHAPMAN, DUFF AND PAUL

Robert Bogin, Esquire
April 21, 1980
Page Five

in any manner it sees fit, including but not limited to direct contributions, expenses and general political propaganda.

Having solicited and received these contributions the CPD determined to use these monies as political contributions to the George Bush campaign. As stated above, in the view of the CPD, these were CPD contributions to George Bush, rather than corporate contributions to Bush being funneled through the CPD, since the funds had been solicited and received by the CPD with no express conditions placed upon their usage. Accordingly, the CPD did not deem its contributions to George Bush to be illegal corporate contributions. Moreover, the CPD did not see a need to identify corporations as the ultimate source of the funds, as in CPD's view the source of the funds was the CPD itself. Finally, as the CPD knew that corporate contributions to George Bush were illegal, the mechanism of utilizing the CPD as the solicitor of such contributions was deemed to be the only legal means of avoiding the proscription.

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CHAPMAN, DUFF AND PAUL

Robert Bogin, Esquire

April 21, 1980

Page Six

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CHAPMAN, DUFF AND PAUL
Robert Bogin, Esquire
April 21, 1980
Page Seven

Thank you for the opportunity to present our views. If the FEC has any questions concerning these matters please feel free to contact me at my office.

Very truly yours,

Charles S. Fax

Charles S. Fax
Counsel for Dona
Julia Rivera de Vincenti

CSF:btf

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LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

TELEPHONE (202) 624-8800

CABLE ADDRESS

"CHADUP"

TELEX NUMBER 89-2798

WILLIAM R. DUFF
PAUL A. LENZINI
GENE PERRY BOND
JAMES S. HOSTETLER
LUI'S GUINOT, JR.
W. N. HARRELL SMITH
ALBERT D. STURTEVANT
CARL W. ULRICH
CHARLES S. FAX
CHERYL C. BURKE
JOEL L. GREENE
ROBERT P. MURPHY
MICHAEL A. KELLY
JOSEPH J. ZIMMERMAN
LYNDA TROUTMAN O'SULLIVAN
WILLIAM A. HUTCHINS
NEAL J. TONKEN
BARBARA E. SCHNEIDER

OSCAR E. CHAPMAN
(1948-1978)
NORMAN S. PAUL
(1919-1978)

COUNSEL

EUGENE T. HERBERT

SAN JUAN, P. R. OFFICE

SUITE 504

PAN AMERICAN BUILDING

HATO REY, PUERTO RICO 00911

TELEPHONE (809) 756-5454

RAFAEL A. GEIGEL

RESIDENT ASSOCIATE

WRITERS DIRECT DIAL NUMBER

(202) 624-8831

CONFIDENTIAL

P12: 24

April 21, 1980

Robert Bogin, Esquire
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Federal Election Commission
Investigation of Possible
Violations of 2 U.S.C §441b
and §441f by Dona Julia
Rivera de Vincenti

Dear Mr. Bogin:

This firm represents Dona Julia Rivera de Vincenti (hereinafter "Dona Julita") in the above-captioned matter. This letter is submitted in accordance with the provisions of 2 U.S.C. §437g(a)(4) and 11 C.F.R. §111.4. We understand that Robert P. Visser, Esquire, General Counsel to the George Bush for President Committee, by letter dated January 25, 1980 to Charles N. Steele, General Counsel to the Federal Election Commission (hereinafter "FEC"), provided information concerning certain fund-raising efforts on behalf of Mr. Bush undertaken by the Comite Pro Campana George Bush (hereinafter "the Comite"), and its chairperson, Dona Julita, in conjunction with the recent presidential primary election campaign in Puerto Rico. We understand further that on February 26, 1980, the FEC found reason to believe, based on the contents of that letter, that Dona Julita may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended (hereinafter, "the Act"), specifically, 2 U.S.C. §441b and §441f.

By letter dated January 29, 1980, the FEC notified Dona Julita of its findings. Thereafter, on March 19 and 20, 1980, the FEC took the sworn testimony of Dona Julita and two of her subordinates, Mr. Rafael Fuentes and Ms. Polly Alemany. This firm represented each of the three witnesses at their depositions. The discussion that follows

CHAPMAN. DUFF AND PAUL
Robert Bogin, Esquire
April 21, 1980
Page Two

below is derived primarily from their deposition transcripts and information obtained during private interviews of the three witnesses. Secondary reliance is placed on certain information provided in Mr. Visser's letter, itself substantially a product of interviews with Dona Julita.

The material facts giving rise to this investigation are undisputed. Citizens of Puerto Rico are not entitled to vote in the quadrennial presidential election held in the United States. As a result, until recently, there was no Puerto Rican citizen participation to speak of in the presidential campaign, and no systematic effort made by presidential candidates to attract support from the Puerto Rican populace at large. In 1979, for the first time, both the Republican and Democratic parties determined to hold presidential primaries in Puerto Rico, notwithstanding the inability of Puerto Rican citizens to participate in the general election. However limited in its scope or import, this event presented the first opportunity for large numbers of Puerto Ricans to involve themselves in a national political campaign.

Puerto Rican politics is heavily dominated by the issue of statehood. A candidate for national political office who takes a position on the issue of Puerto Rican statehood can expect to obtain support in Puerto Rico from that political faction that maintains the same view, largely irrespective of his position on other issues. George Bush has taken a strong stand in favor of statehood, and has thus attracted the active support of Commonwealth citizens who themselves favor statehood for Puerto Rico.

Dona Julia Rivera de Vincenti is a distinguished public citizen of the Commonwealth of Puerto Rico and a strong advocate of Puerto Rican statehood. Dona Julita, as she is universally known, is a graduate of New York University with advanced degrees from Columbia and Cornell Universities. A professor of labor law at the University of Puerto Rico, in 1968 Dona Julita was appointed Secretary of Labor of the Commonwealth of Puerto Rico, the first woman to achieve cabinet rank in the Commonwealth government. She served in that position until 1972. In 1974 she was appointed by President Nixon as an alternate delegate to the United Nations, the first Puerto Rican ever named to the United States Mission. Currently, Dona Julita serves as Administrator of the State Insurance Fund for the Commonwealth of Puerto Rico, a cabinet-level position to which she was appointed by Governor Carlos Romero Barcelo.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MCE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*
DATE: APRIL 2, 1980
SUBJECT: MUR 1181 - Interim Investigative Report #1
dated 3-31-80; Received in OCS 3-31-80,
4:12

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, April 1, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

310:0:0:0:0:0

March 31, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1181

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

31710231033

RECEIVED
OFFICE OF THE
BEFORE THE FEDERAL ELECTION COMMISSION

80 MAR 31 P 4: 12

In the Matter of)
Julita Rivera De Vincenti)

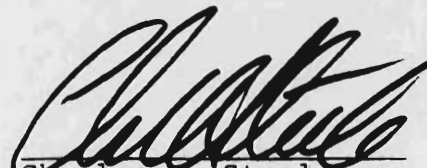
MUR 1181

INTERIM INVESTIGATIVE REPORT # 1

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On February 26, 1980, the Commission found reason to believe that Mrs. Vincenti violated 2 U.S.C. § 441f and § 441b, and authorized the taking of her deposition as well as those of three witnesses. This Office took Mrs. Vincenti's deposition and those of two out of the three witnesses on March 19 and 20. The deposition of Mrs. Guilda Julia did not occur because, due to an extended trip out of Puerto Rico, she did not receive notification. The investigation into this matter will continue, and this Office will attempt to elicit information from Mrs. Julia by way of written questions. Upon receipt of the answers to the questions and the transcripts of the depositions, this Office will be prepared to report to the Commission and make the appropriate recommendations.

31 March 1980
Date


Charles N. Steele
General Counsel

31000101010

PS Form 3811, Aug. 1978

1. **SENDER** Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

The following service is requested (check one):

- Show to whom and date delivered _____
- Show to whom, date, and address of delivery _____
- RESTRICTED DELIVERY
Show to whom and date delivered _____
- RESTRICTED DELIVERY
Show to whom, date, and address of delivery _____

(CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO:**
Hilda Julia

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO. <i>61570</i>	INSURED NO.
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(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE Addressee Authorized agent

Ismael Feliciano

4. **DATE OF DELIVERY:** JUN 23 1980
POSTMARK: [Circular postmark: JUN 23 1980]

5. **ADDRESS (Complete only if requested):**

6. **UNABLE TO DELIVER BECAUSE:**

U.S. POSTAL SERVICE

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1181 - Boston



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 11, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gilda Julia
P. O. Box 11605
Santurce, Puerto Rico 00910

RE: MUR 1181

Dear Ms. Julia:

The Commission is in receipt of your April 30, 1980, letter wherein you respond to the questions enclosed in the Commission's letter of April 21, 1980. A review of your response raises an additional question that the Commission needs answered to complete its investigation.

Enclosed please find photocopies of twelve corporate checks issued to "Cuidadanos Pro Democracia". In your April 30, 1980 letter, you state that "no contributions were made to "Cuidadanos Pro Democracia," yet, as you can see from the photocopies, checks apparently signed by you were issued to Cuidadanos Pro Democracia. Would you please explain this apparent discrepancy?

If you have any questions concerning this matter, please contact Robert Bogin at (202) 523-4529. Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

Enclosure

31740:3:0:5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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RETURN RECEIPT REQUESTED

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Santurce, Puerto Rico 00910

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Sincerely,

Charles N. Steele
General Counsel

Enclosure

RB
6/11/80

3171031017

September 6, 19 79

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

THE 504500 DOLS 00 CTS DOLLARS

CITIBANK
CIBCARR, N.A.
Hato Rey, P.R. 00910

Ron Yon
Gilberto

12/19/79
ck # 4136

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PUERTO NUEVO DEVELOPMENT CORP.
APARTADO 11605 SANTURCE 00910 2488

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

September 6, 19 79

PAY THE AMOUNT OF TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

THE 504500 DOLS 00 CTS

PUERTO NUEVO DEVELOPMENT CORP.

CIUDADANO PRO DEMOCRACIA

Ron Yon
Gilberto

12/19/79
ck # 4137

⑆0215⑉0204⑆ 0478237⑈

TRIPLE A INVESTMENTS, INC.
P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-204 215 No 2
DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA THE 504500 DOLS 00 CTS DOLLARS \$ 500.00**

CIUDADANO PRO DEMOCRACIA

TRIPLE A INVESTMENTS, INC.

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

Ron Yon
Gilberto

12/19/79
ck # 4134

⑆0215⑉0204⑆ 0239645⑈

SILVER, INC.
P.O. BOX 11605
SANTURCE, P.R. 00910

101-204
215

0-06-79

EXACTLY \$500.00/100**

CHECK NO. \$ 500.00**
SILVER, INC.

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA

12/19/79
ck # 4133

⑆0215⑉0204⑆ 0239645⑈

31710231013

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

THE 500 00 DOLS 00 CTS

DOLLARS

GIRAFÁ, INC

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

12/19/79
CK # 4132

⑆0215⑉0204⑆ 0478938⑆

SAN JUAN REALTY CORP.

P. O. BOX 11605
SANTURCE, P.R. 00910

No 168

101-222
215

September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO-DEMOCRACIA \$ 500.00**

THE 500 00 DOLS 00 CTS

DOLLARS



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

12/19/79
CK # 4127

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INDUSTRIAL WAREHOUSE INC.

P. O. BOX 11605
SANTURCE, PUERTO RICO

101-204
215

No 990

DATE September 6, 1979

PAY TO THE ORDER OF

THE 500 00 DOLS 00 CTS

DOLLARS \$ 500.00**

CIUDADANO PRO DEMOCRACIA

INDUSTRIAL WAREHOUSES INC.

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

12/19/79
CK # 4128

⑆0215⑉0204⑆ 024775⑆

CASTLE ENTERPRISES, INC.

P. O. BOX 11605
SANTURCE, P.R. 00910

No 123

101-002
215

September 6, 1979

PAY TO THE ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

THE 500 00 DOLS 00 CTS

DOLLARS



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

12/19/79
CK # 4131

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 20,000.00
 650,000.00

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA

TWO THOUSAND FIVE HUNDRED DOLLARS AND NO CENTS

ALMAC ENTE

FIRST NATIONAL CITY BANK
MAYO REY, PUERTO RICO

Julia

12/19/79
ck # 4130

⑆0215⑉0204⑆ 0484563⑈

12 to
Gilda
Julia

+3

650,000.00

CITY ENTERPRISES, INC.
P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-224
319

015 items

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

TWO THOUSAND FIVE HUNDRED DOLLARS AND NO CENTS

CITY ENTERPRISES, INC.

FIRST NATIONAL CITY BANK
MAYO REY, PUERTO RICO

Julia

12/19/79
ck # 4129

⑆0215⑉0204⑆ 0478946⑈

LEASING & BROKERAGE, INC.
APARTADO 11605 SANTURCE 00910

520 101-224
319

FIRST NATIONAL CITY BANK
Mayo Rey Branch, Santurce, Puerto Rico

September 6, 1979

THE AMOUNT OF THE ORDER OF TWO THOUSAND FIVE HUNDRED DOLLARS AND NO CENTS \$ 500.00**

CIUDADANO PRO DEMOCRACIA

Leasing & Brokerage, Inc.
Julia
AUTHORISED SIGNATURE

12/19/79
ck # 4135

⑆0215⑉0204⑆ 0240660⑈

PUERTO NUEVO DISTRIBUTION CENTER, INC.
P.O. BOX 11605
SANTURCE, PUERTO RICO 00910

Nº 2225

September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

TWO THOUSAND FIVE HUNDRED DOLLARS AND NO CENTS

CITIBANK

PUERTO NUEVO DISTRIBUTION CENTER, INC.

12/19/79
ck # 4138

⑆0215⑉0204⑆ 0484563⑈

Julia

JD

31710135011

CERTIFIED

P02 8533926

MAIL

Mr. Charles N. Steele, Esq.
General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

GILDA JULIÁ
P. O. Box 11605
SANTURCE, P. R. 00910

CERTIFIED WITH RETURN
RECEIPT REQUESTED #PO2 8533926

507893

April 30, 1980

~~9/17/80~~

3 1 7 1 0 1 3 3 0 1 2
Mr. Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1181

Dear Mr. Steele:

I acknowledge receipt of your letter dated April 21, 1980.
Correct spelling of my first name is Gilda.

My letter of November 15, 1979 to Mr. James A. Baker, III
Chairman, George Bush for President, is correct in every respect.
No corporate checks were written out to "Ciudadanos Pro Demo-
cracia".

a) I know that the corporate checks were made to "Comité
Pro Campaña George Bush" because I had them issued that way,
and because I co-signed them that way.

b) My belief was that its purpose was to win the primaries
in Puerto Rico for Mr. Bush.

c) I do not know.

d) I do not know. I had never heard of them until
Mr. James A. Baker, III mentioned them in a letter he wrote
to me returning the contributions made by my corporations.

e) I do not know.

f) No contributions were made to "Ciudadanos Pro Democracia".

g) No

10 MAY 6 P 3: 03

/.....

GENERAL

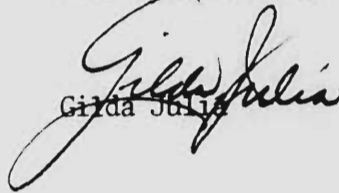
11

Mr. Charles N. Steele, Esq.
Page 2
April 30, 1980

h) N/A

i) N/A - No contributions were made to "Ciudadanos Pro Democracia".

Very truly yours,


Gilda Julia

mm

3100191010

90c
RECEIVED

MAY 11 AM 11 12

LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

TELEPHONE (202) 624-8800

CABLE ADDRESS

"CHADUP"

TELEX NUMBER 89-2798

OSCAR L. CHAPMAN
(1896-1978)

NORMAN S. PAUL
(1919-1978)

COUNSEL
EUGENE T. HERBERT

SAN JUAN P. R. OFFICE
SUITE 504

PAN AMERICAN BUILDING
HATO REY, PUERTO RICO 00917
TELEPHONE (809) 756-5454

RAFAEL A. GEIGEL
RESIDENT ASSOCIATE

WRITER'S DIRECT DIAL NUMBER

(202) 624-8831

WILLIAM R. DUFF
PAUL A. LENZINI
GENE PERRY BOND
JAMES S. HOSTETLER
LUIS GUINOT, JR.
W. N. HARRELL SMITH
ALBERT D. STURTEVANT
CARL W. ULRICH
CHARLES S. FAX
CHERYL C. BURKE
JOEL L. GREENE
ROBERT P. MURPHY
MICHAEL A. KELLY
JOSEPH J. ZIMMERMAN
LYNDA TROUTMAN O'SULLIVAN
WILLIAM A. HUTCHINS
NEAL J. TONKEN
BARBARA E. SCHNEIDER

April 29, 1980

Robert Bogin, Esquire
Office of the General Counsel
Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Bob:

The enclosed letter was mailed to our firm by mistake. It was opened by our mail clerk and given to me before I was aware of the problem. As soon as I saw the mistake, I replaced the letter in the envelope. I regret any inconvenience.

Sincerely,

Charles S. Fax

CSF:btf
Enclosure

MAY 1 P 1: 59

31710131011

cc # 1217

LAW OFFICES

HARTZELL, YDRACH, MELLADO, SANTIAGO & PEREZ

CHARLES R. HARTZELL (1923-1963)
VICENTE M. YDRACH (1952-1978)

G. P. O. BOX 4307
SAN JUAN, PUERTO RICO 00936

RAMÓN MELLADO-GONZÁLEZ
A SANTIAGO-VILLALONGA
FERNANDO PÉREZ-COLÓN
JORGE BERMÚDEZ TORREGROSA
FRANCISCO G. BRUNO
LUIS R. MELLADO-GONZÁLEZ
FRANCISCO R. HERNÁNDEZ-RUIZ
MANUEL MOREDA-TOLEDO
LUISA M. ALVAREZ-CAMACHO

COUNSEL
RAFAEL O. FERNÁNDEZ
P. JUVENAL ROSA

SUITE 1530 BANCO POPULAR CENTER
HATO REY, PUERTO RICO
TELEPHONE 754-2600
AREA CODE 809

CABLE ADDRESS: HARTZELL
TELEX NO. CW-WUI 3654204
TELECOPIER (809) 754-8306
WRITER'S DIRECT DIAL NUMBER:

April 22, 1980

Ralph Bogin, Esq.
Chapman, Duff & Paul
1730 Pennsylvania Ave. N. W.
Washington, D. C. 20006

Dear Sir:

We have a check in the amount of \$31.00 to the order of Guilda Juliá, for witness fee.

Please be informed that Mrs. Juliá have never appeared to depose in any case, because said case was postponed. I want you to bare in mind that Mrs. Julia is most of the time travelling. For the above reason, we are returning the above mentioned check.

If you further need Mrs. Juliá, please let us know.

Very truly yours,

HARTZELL, YDRACH, MELLADO,
SANTIAGO & PEREZ

Ramón Mellado González

RMG/ac

Encls.

10 MAY 1 P 2:02

10 MAY 1 P 1:59

RECEIVED

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 23,701,611
SYMBOL 3004

NOT FOLD, SPINdle OR MATErIAL
USE EXHIBIT ...



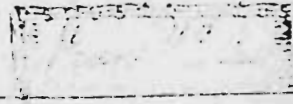
United States Treasury

PAY TO THE
ORDER OF GUILDA JULIA

02 29 80
35350001

DECLASS	CON
*****31	CO

F E C
WASH DC
WC136



LAW OFFICES
HARTZELL, YDRACH, MELLADO, SANTIAGO & PEREZ
G. P. O. BOX 4307
SAN JUAN, PUERTO RICO 00936



Via Air Mail

Ralph Bogin, Esq.
Chapman, Duff & Paul
1730 Pennsylvania Ave. N. W.
Washington, D. C. 20006

8 1 0 4 0 2 3 3 0 1 8

LAW OFFICES

CHAPMAN, DUFF AND PAUL.

1730 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

Robert Logan, Esquire
Office of the General Counsel
Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

NOV 11 AM 11:11

RECEIVED

BC 2301

GEORGE BUSH FOR PRESIDENT

100

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

February 8, 1980

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Steele:

Reference is made to our recent discussion with regard to the situation in Puerto Rico and my submission dated January 25, 1980.

As you may recall, it was Mrs. Guilda Julia's letter which first alerted George Bush for President as to the confusion occasioned in Puerto Rico. Enclosed is a self-explanatory letter we received from Mr. Slabin and Mrs. Julia each enclosing checks in the amount of \$250.00 as a personal contribution.

I will keep you advised as to any further developments with regard to this matter.

Sincerely,

Robert P. Visser
General Counsel

RPV:jc
encl.
cc: James A. Baker, III

50 . 114 11 1980

3171013117

Raul M. Slavin

P. O. Box 11605, SANTURCE, PUERTO RICO 00910

January 24, 1980

Mr. Robert P. Visser, General Counsel
George Bush for President
710 N. Post Oak Road, Suite 208
Houston, Texas 77024

Dear Mr. Visser:

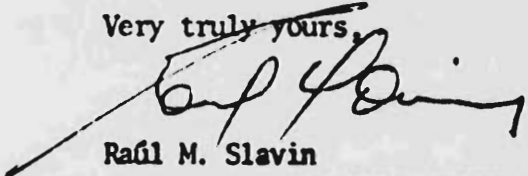
We acknowledge receipt of your letter dated December 28, 1979. Our office was closed for vacation and we have just returned to work this week.

In Puerto Rico, our law allows political contributions from the treasuries of corporations, thus we saw no problem in the manner in which our contribution was offered.

We are enclosing a personal contribution from each one of us, which, unfortunately does not match the original intention, since our personal funds are relatively limited.

With our best wishes to the next President, we remain,

Very truly yours,


Raúl M. Slavin

mm

Enclosure

DATE 1-28-80

Citibank, N.A.
Puerto Rico

REY 03

191-204
215

DETAILS OF PAYMENT

251472

CITY BANK N.A. **US\$250.00**
PAY TO THE ORDER OF P.R.

\$ 250.00****

GEORGE BUSH FOR PRESIDENT

AUTHORIZED SIGNATURE

LUIS O. GARCIA
Authorized Signature

⑈ 200900251472⑈ ⑆021502040⑆

George Bush for President

710 N. Post Oak Road, Suite 208, Houston, Texas 77024

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name **Raúl M. Slavin**

Home Address **P. O. Box 11605**

City **Santurce**

State **Puerto Rico**

Zip **00910**

Telephone Number **(809) 796-2588**

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

Title of Occupation **President**

Name of company (or self-employed) **Puerto Nuevo Development Corp.** City / State **San Juan, PR**

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463

Printed by George Bush for President

GILDA JULIA
P.O. BOX 11605
SANTURCE, P. R. 00910

No. 476

Jan. 28, 1980. 101-204
215

PAY TO THE ORDER OF

George Bush for President

\$ 250.00

Two Hundred Fifty

Two DOLLARS



FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

FOR Contribution

Gilda Julia

⑆0215⑆⑆0204⑆ 0237736⑆

George Bush for President

710 N. Post Oak Road, Suite 208, Houston, Texas 77024

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name **Gilda Julia**
Home Address **P. O. Box 11605**
City **Santurce** State **Puerto Rico** Zip **00910**
Telephone Number **(809) 796-2588**

Please make checks payable to "George Bush for President" Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please

Federal law requires us to ask for the following information:

Title of Occupation **President**

Name of company (or self-employed) **Tierra, Inc.** City / State **San Juan, PR**

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463

Part of the George Bush for President

313101354

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1 The following service is requested (check one).
 Show to whom and date delivered _____
 Show to whom, date, and address of delivery _____
 RESTRICTED DELIVERY
 Show to whom and date delivered _____
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery. \$ _____
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO:
Yilda Julia

3 ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 _____ *944596* _____
 (Always obtain signature of addressee or agent)

I have received the article described above
 SIGNATURE Addressee Authorized agent
Ymael Heliciano

4 DATE OF DELIVERY
APR 29 1980

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE _____
 CARRIER INITIALS _____



GPO: 1978-272-382

MUR 1181 - *Basin*



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

April 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gilda Julia
P.O. Box 11605
Santurce, Puerto Rico 00910

RE: MUR 1181


Dear Mrs. Julia:

By letter dated March 7, 1980, you were notified that your appearance was requested for a deposition on March 21, 1980, in connection with an investigation being conducted by the Federal Election Commission. Enclosed in that letter was a check for \$31.00 for witness fees for your attendance. Through conversations with your attorney, this Office learned that you were unaware of the Commission's request and that you were not in Puerto Rico during the week of March 17, 1980, and thus unavailable to the Commission for the taking of your deposition.

In order to facilitate the Commission's investigation and to preclude the necessity of taking your deposition, the Commission requests that you respond in writing to the questions enclosed with this letter. These questions are being asked in connection with contributions you or corporations controlled by you made on September 6, and October 31, 1979. Please respond to these questions expeditiously. In addition please return the Commission's check for \$31.00 that was issued to cover the expenses of your appearance for deposition

If you have any questions concerning this matter, please contact Robert Bogin at (202) 523-4073. Thank you for your cooperation.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

3101013105

FEDERAL ELECTION COMMISSION

QUESTIONS TO BE ANSWERED BY GUILDA JULIA

MUR 1181

In your letter of November 15, 1979, to James A. Baker, Chairman of the George Bush for President Committee (copy attached) you state that contributions of \$500.00 each were made by 12 corporations of which you own a majority of the stock, or all the stock, to "Comite Pro Campaña George Bush". However, the Federal Election Commission has knowledge that these corporate checks were written out to "Cuidadanous Pro Democracia".

- a. Why did you think that the corporate checks were made to "Comite Pro Campaña George Bush"?
- b. What is the purpose of the "Comite Pro Campaña George Bush"?
- c. Who is the chairman of the "Comite Pro Campaña George Bush"?
- d. What is the purpose of the "Cuidadanous Pro Democracia"?
- e. Who is the chairman of the "Cuidadanous Pro Democracia"?
- f. Why did your twelve corporations contribute \$500 each to "Cuidadanous Pro Democracia"?
- g. Were you solicited by someone to make contributions to "Cuidadanous Pro Democracia"?
- h. If you were solicited, by whom?
- i. What was your understanding, if any, as to how your twelve corporate contributions to "Cuidadanous Pro Democracia" were to be used?

3101013055

NOV 19 1979

GILDA JULIÁ
P. O. Box 11605
SANTURCE, P. R. 00910

November 15, 1979

Mr. James A. Baker, III, Chairman
George Bush for President
710 North Post Oak Road
Suite 208
Houston, Texas 77024

Dear Mr. Baker:

I am returning your letter requesting confirmation of contributions to George Bush for President because:

1. I did not personally contribute any amount
2. Contributions of \$500.00 each were made by the following Corporations, of which I personally own a majority of the stock, or all the stock
 - a. San Juan Realty Corporation
 - b. Industrial Warehouses, Inc.
 - c. City Enterprises, Inc.
 - d. Almac Enterprises, Inc.
 - e. Castle Enterprises, Inc.
 - f. Girafa, Inc.
 - g. Silver, Inc.
 - h. Triple A Investment, Inc.
 - i. Leasing & Brokerage, Inc.
 - j. Gateway Plaza, Inc.
 - k. Puerto Nuevo Distribution Center, Inc.

Attachment No. 2

31710131017

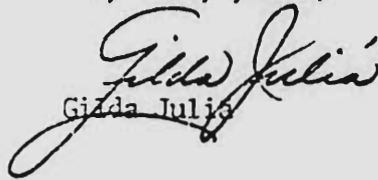
Mr. James A. Baker, III

- 2 -

November 15, 1979

1. Puerto Nuevo Development Corporation
3. All checks were made out to: "Comité Pro Campaña George Bush"

Very truly yours,


Gilda Julia

aet

Enclosure

3101023003

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645

600#
743

western union Mailgram



4-0271298074002 03/14/80 ICS IPMTZZ CSP WSHB
1 2025234073 MGM TDMT WASHINGTON DC 03/14/1226P EST

COMMISSION

00 MAR 17 PM 5:16

FEDERAL ELECTION COMMISSION ROBERT BOGIN
1325 K ST NORTHWEST
WASHINGTON DC 20463

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

LT TDMT WASHINGTON DC 03-14 1226P EST
INT LT GUILDA JULIA
PO BOX 11605
SANTURCE00910 (PUERTO RICO)
DEAR MRS JULIA
DATE AND TIME FOR YOUR DEPOSITION HAS BEEN CHANGED TO MARCH 20TH AT
10AM. IF THIS CHANGE OF TIME CAUSES A PROBLEM CALL HAL PONDER OF THE
FEDERAL ELECTION COMMISSION AT 2025234166
ROBERT BOGIN

COL 11605 SANTURCE00910 20TH 10AM. 2025234166

12:26 EST

MGMCOMP MGM

10-101-758

11 MAR 21

Western Union **Mailgram**

U.S. MAIL

PLEASE REPLY

THIS MAILGRAM WAS TRANSMITTED ELECTRONICALLY BY WESTERN UNION TO A POST OFFICE NEAR YOU FOR DELIVERY

31710

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645

western union Mailgram



COMMISSION
4-0269108074002 03/14/80 ICS IPMMTZZ CSP WSHB
1 2025234073 MGM TDMT WASHINGTON DC 20544 1224P EST
MAR 17 PM 3:17

FEDERAL ELECTION COMMISSION ROBERT BOGIN
1325 K ST NORTHWEST
WASHINGTON DC 20463

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

LT TDMT WASHINGTON DC 03-14 1224P EST
INT LT RAFAEL FUENTES
COND GARDEN HILL PLAZA I APT 504
GUAYNABO00657 (PUERTO RICO)
DEAR MR FUENTES
DATE AND TIME FOR YOUR DEPOSITION HAS BEEN CHANGED TO MARCH 19TH AT
3PM, IF THIS CHANGE OF TIME CAUSES A PROBLEM CALL HAL PONDER OF THE
FEDERAL ELECTION COMMISSION AT 2025234166
ROBERT BOGIN

COL 504 GUAYNABO00657 19TH 3PM, 2025234166

12:24 EST

MGMCOMP MGM

WESTERN UNION MAIL



CHARGE PAID

THIS MAILGRAM WAS TRANSMITTED ELECTRONICALLY BY WESTERN UNION TO A POST OFFICE NEAR YOU FOR DELIVERY

390101018

PS Form 3811, Aug. 1978

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY
 Show to whom and date delivered
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Sheld a Julia

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | 944145 |

(Always obtain signature of addressee or agent)

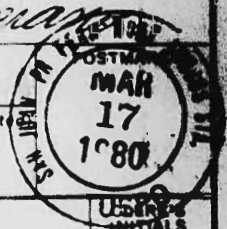
I have received the article described above.
 SIGNATURE Addressee Authorized agent
Samuel Feliciano

4. DATE OF DELIVERY
 MAR 17 1980

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

U.S. MAIL INITIALS



GPO: 1978-272-202

Sheld 1181 - Boston



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gilda Julia
P.O. Box 11605
Santurce, Puerto Rico 00910

RE: MUR 1181

Dear Ms. Julia:

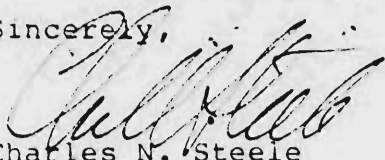
In connection with an investigation being conducted by the Federal Election Commission, please find enclosed an order requesting your appearance for deposition on March 21, 1980 at 2 P.M. By issuing this order, the Commission is seeking information concerning Ciudadanous Pro Democracia and the George Bush for President Committee.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. Pursuant to Commission regulation (11 C.F.R. §111.12), please find enclosed witness fees and mileage for your attendance.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at 202/523-4073.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

Order
Witness Fees



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Guilda Julia
P.O. Box 11605
Santurce, Puerto Rico
00910

RE: MUR 1181

Dear

In connection with an investigation being conducted by the Federal Election Commission, please find enclosed an order requesting your appearance for deposition on March 21 at 2 p.m. By issuing this order, the Commission is seeking information concerning Ciudadanous Pro Democracia and the George Bush for President Committee.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. Pursuant to Commission regulation (11 C.F.R. §111.12), please find enclosed witness fees and mileage for your attendance.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at 202/523-4073.

Sincerely,

Charles N. Steele
General Counsel

CS
2/29/80

Enclosure

Order
Witness Fees

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Order to Appear for Deposition Upon
Oral Examination

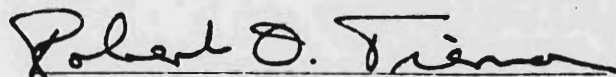
TO: Guilda Julia
P.O. Box 11605
Santurce, Puerto Rico 00910

RE: MUR 1181

At the instance of The Federal Election Commission,
pursuant to 2 U.S.C. §437d(a)(4), you are hereby ordered to
appear for deposition in connection with the Commission's
investigation of possible violations of the Federal Election
Campaign Act of 1971, as amended.

Notice is hereby given that the deposition is to be
taken at Pan-Am Building, Suite 504, Hato Rey, Puerto Rico
at 2:00 P.M. on Friday, March 21, 1980, and any and all
dates adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., on the 28th
day of February, 1980.


Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:


MARJORIE W. EMMONS
SECRETARY TO THE COMMISSION

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 23,701,611
SYMBOL 3004

DO NOT FOLD, SPREAD, OR REFRIGERATE
KNOW YOUR ENEMY ... KNOW THE IDENTIFICATION



United States Treasury

PAY TO THE
ORDER OF GUILDA JULIA

02 29 180
95350001

DOLLARS	CENTS
*****31	00

F E C
WASH DC
WC136

FFCAW186 WITNESS FEE MLR
PRE 50

[Signature]

31010136058

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3
Add your address in the "RETURN TO" space on reverse

1 The following service is requested (check one)
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY
 Show to whom and date delivered
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO:
Polly Alemany

3 ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 944146
 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
[Signature]

4 DATE OF DELIVERY

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE

U.S. POSTAL SERVICE
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 NEW YORK, N.Y. P.O. 65TH INF. ST.

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PS Form 3811, Aug. 1978



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Polly Alemany
136 Amazonas Street
U.P.B. El Paraiso
Rio Piedras, Puerto Rico 00926

RE: MUR 1181

Dear Ms. Alemany:

In connection with an investigation being conducted by the Federal Election Commission, please find enclosed an order requesting your appearance for deposition on March 20, 1980 at 2 P.M. By issuing this order, the Commission is seeking information concerning Ciudadanos Pro Democracia and the George Bush for President Committee.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. Pursuant to Commission regulation (11 C.F.R. §111.12), please find enclosed witness fees and mileage for your attendance.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at 202/523-4073.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

Enclosure

Order
Witness Fees



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Polly Alemany
136 Amazonas Street
U.P.B. El Paraiso
Rio Piedras, Puerto Rico 00926

RE: MUR 1181

Dear Ms. Alemany:

In connection with an investigation being conducted by the Federal Election Commission, please find enclosed an order requesting your appearance for deposition on March 20 at 2 P.m. By issuing this order, the Commission is seeking information concerning Ciudadanous Pro Democracia and the George Bush for President Committee.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. Pursuant to Commission regulation (11 C.F.R. §111.12), please find enclosed witness fees and mileage for your attendance.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at 202/523-4073.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Order
Witness Fees

CS
2/29/80

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Order to Appear for Deposition Upon
Oral Examination

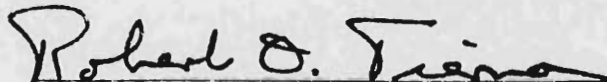
TO: Polly Alemany
136 Amazonas Street
U.P.B. El Paraiso
Rio Piedras, Puerto Rico 00926

RE: MUR 1181

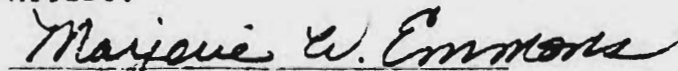
At the instance of The Federal Election Commission,
pursuant to 2 U.S.C. §437d(a)(4), you are hereby ordered to
appear for deposition in connection with the Commission's
investigation of possible violations of the Federal Election
Campaign Act of 1971, as amended.

Notice is hereby given that the deposition is to be
taken at Pan-Am Building, Suite 504, Hato Rey, Puerto Rico
at 2:00 P.M. on Thursday, March 20, 1980, and any and all
dates adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., on the 28th
day of February, 1980.


Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:


MARJORIE W. EMONS
SECRETARY TO THE COMMISSION

3101023071

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TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 23,701,610
SYMBOL 3004

DO NOT FOLD, STAPLE OR WRITE ON THIS CHECK
KNOW YOUR EMPLOYER'S CHECK NUMBER



United States Treasury 15-51
000

PAY TO THE
ORDER OF POLLY ALEMANY
02 29 80
95350001

DOLLARS	CTS.
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F E C
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W0136

FECAN 196 WITNESS FEE PUR
PRE 50

Henry H. ...

317013073

PS Form 3811, Aug 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3
Add your address in the "RETURN TO" space on reverse.

1 The following service is requested (check one):
 Show to whom and date delivered _____
 Show to whom, date, and address of delivery _____
 RESTRICTED DELIVERY
 Show to whom and date delivered _____
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$ _____
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO:
Rafael Fuentes

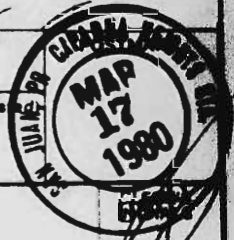
3 ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 _____ *944147* _____
 (Always obtain signature of addressee or agent)

I have received the article described above
 SIGNATURE Addressee Authorized agent
Fuentes

4 DATE OF DELIVERY _____

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE _____



Pre-Milk SO. Boston



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rafael Fuentes
Cond. Garden Hill Plaza Apt. 504
Cond. Garden Hill Plaza I
Guaynabo, Puerto Rico 00657

RE: MUR 1181

Dear Mr. Fuentes:

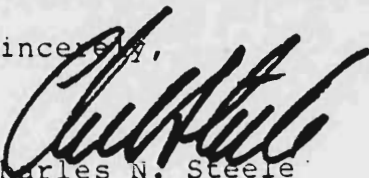
In connection with an investigation being conducted by the Federal Election Commission, please find enclosed an order requesting your appearance for deposition on March 21, 1980 at 10 A.M. By issuing this order, the Commission is seeking information concerning Ciudadanos Pro Democracia and the George Bush for President Committee.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. Pursuant to Commission regulation (11 C.F.R. §111.12), please find enclosed witness fees and mileage for your attendance.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at 202/523-4073.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

Order
Witness Fees



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rafael Fuentes
Cond. Garden Hill Plaza Apt. 504
Cond. Garden Hill Plaza I
Guaynabo, Puerto Rico 00657

RE: MUR 1181

Dear Mr. Fuentes:

In connection with an investigation being conducted by the Federal Election Commission, please find enclosed an order requesting your appearance for deposition on March 7 at 4 p.m. By issuing this order, the Commission is seeking information concerning Ciudadanous Pro Democracia and the George Bush for President Committee.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. Pursuant to Commission regulation (11 C.F.R. §111.12), please find enclosed witness fees and mileage for your attendance.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at 202/523-4073.

Sincerely,

Charles N. Steele
General Counsel

RB
2/29/80

Enclosure

Order
Witness Fees

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Order to Appear for Deposition Upon
Oral Examination

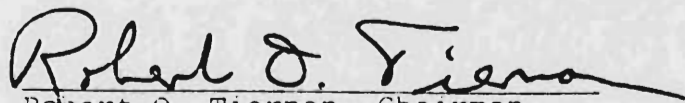
TO: Rafael Fuentes
Cond. Garden Hill Plaza Apt. 504
Cond. Garden Hill Plaza I
Guaynabo, Puerto Rico 00657

RE: MUR 1181

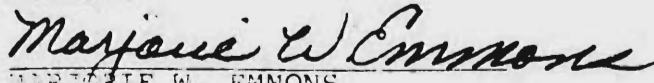
At the instance of The Federal Election Commission,
pursuant to 2 U.S.C. §437d(a)(4), you are hereby ordered to
appear for deposition in connection with the Commission's
investigation of possible violations of the Federal Election
Campaign Act of 1971, as amended.

Notice is hereby given that the deposition is to be
taken at Pan-Am Building, Suite 504, Hato Rey, Puerto Rico
at 10:00 A.M. on Friday, March 21, 1980, and any and all
dates adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., on the 28th
day of February, 1980.


Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:


MARJORIE W. EMMONS
SECRETARY TO THE COMMISSION

31710:3:75

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 23,701,609
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSEER ... KNOW THE DIFFERENCE



United States Treasury ¹⁵⁻⁵¹/₀₀₀

PAY TO THE
ORDER OF RAFAEL FUENTES

MONTH DAY YEAR
02 29 80
95350001

DOLLARS	CTS.
*****31	00

F E C
WASH DC
W0136

FECAW136 WITNESS FEE MUR
225 50

Henry ...



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 29, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Julia R. de Vincenti
762 Lopez Sicardo Avenue
Dos Pinos, Rio Piedras
Puerto Rico 00923

Re: MUR 1181

Dear Mrs. Vincenti:

3
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3

The Commission is in receipt of the letter written by Robert P. Visser, General Counsel to the George Bush for President Committee to Charles N. Steele the General Counsel of the Federal Election Commission dated January 25, 1980, of which you were to be sent a copy. Based on that letter, the Commission on February 26, 1980, found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, (the "Act"), and directed the Office of the General Counsel to conduct an investigation of this matter. Specifically, the Commission found that you may have violated 2 U.S.C. §441b and §441f by knowingly receiving contributions from corporations and using these monies to make contributions to the George Bush for President Committee in the names of others. A summary of the possible violations is enclosed.

Under the Act, you have an opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In addition, the Commission has issued the attached order which requires you to appear and give sworn testimony on March 7, 1980, at 10 a.m. The issuance of this order will assist the Commission in carrying out its statutory duty of supervising compliance with the Act. You may consult with your attorney and have an attorney present with you at the deposition.

Letter to: Honorable Julia R. de Vincenti
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Robert Bogin, the attorney assigned to this matter at (202) 423-4073. For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act.

Sincerely,

Robert O. Tiernan
ROBERT O. TIERNAN
Chairman

Enclosures

1. Summary of Possible Violations
2. Order
3. Procedures

cc: Rafael Geigel

PN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. I have received the article described above.
SIGNATURE Addressee Authorized agent

2. ARTICLE ADDRESSED TO:
Mr. Julia R. de Vincenti

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.

4. DATE OF DELIVERY: *3/8/78*
POSTMARK *6*

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE: _____
CLERK'S INITIALS _____

1181
Bogin

★GPO: 1977-0-249 595

7c Form 3811, Aug. 1976

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):
 Show to whom and date delivered. _____
 Show to whom, date, and address of delivery. _____
 RESTRICTED DELIVERY
Show to whom and date delivered. _____
 RESTRICTED DELIVERY
Show to whom, date, and address of delivery. \$ _____
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rafael Geigel

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
994083

4. I have received the article described above.
SIGNATURE Addressee Authorized agent
[Signature]

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE: _____
CLERK'S INITIALS _____

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

★GPO: 1976-272-382

1181 Bogin

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE February 26, 1980

MUR NO. 1181

STAFF MEMBER & TEL.. NO.

Robert Bogin

RESPONDENT Julita R. de Vincenti

(202) 523-4073

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

Based on information supplied to the Commission by the George Bush for President Committee, the Commission has made findings with respect to contributions made to the George Bush for President Committee.

PRELIMINARY FACTUAL BASIS
AND LEGAL ANALYSIS

2 U.S.C. §441b makes it unlawful for any corporation to make a contribution or expenditure in connection with any federal election, or for any person knowingly to accept or receive any contribution prohibited by §441b. From the information provided, it appears that you received contributions from various corporations owned or controlled by Guilda Julia among others, and that you used these corporate funds to make contributions in connection with the presidential primary election of George Bush.

2 U.S.C. §441f prohibits a person from making a contribution in the name of another person. It would appear that upon receiving the aforementioned corporate contributions, you made contributions to the George Bush for President Committee with these funds in the names of at least fifteen individuals.

FINDINGS

Based on the foregoing analysis, the Federal Election Commission has found reason to believe that you may have violated 2 U.S.C. §§441b and 441f.

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Order to Appear for Deposition Upon
Oral Examination

TO: Julia R. de Vincenti
762 Lopez Sicardo Avenue
Dos Pinos, Rio Piedras
Puerto Rico 00923

RE: MUR 1181

31710131731
At the instance of The Federal Election Commission,
pursuant to 2 U.S.C. §437d(a)(4), you are hereby ordered to
appear for deposition in connection with the Commission's
investigation of possible violations of the Federal Election
Campaign Act of 1971, as amended.

Notice is hereby given that the deposition is to be
taken at 1325 K Street, N.W., Washington, D.C., 7th Floor
at 10:00 a.m. on Friday, March 7, 1980, and any and all
dates adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., on the 28th
day of February, 1980.

Robert O. Tiernan
Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
MARJORIE W. EMMONS
SECRETARY TO THE COMMISSION



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Julia R. de Vincenti
762 Lopez Sicardo Avenue
Dos Pinos, Rio Piedras
Puerto Rico 00923

Re: MUR 1181

Dear Mrs. Vincenti:

31710131732
The Commission is in receipt of the letter written by Robert P. Visser, General Counsel to the George Bush for President Committee to Charles N. Steele the General Counsel of the Federal Election Commission dated January 25, 1980, of which you were to be sent a copy. Based on that letter, the Commission on February 16, 1980, found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, (the "Act"), and and directed the Office of the General Counsel to conduct an investigation of this matter. Specifically, the Commission found that you may have violated 2 U.S.C. §441b and §441f by knowingly receiving contributions from corporations and using these monies to make contributions to the George Bush for President Committee in the names of others. A summary of the possible violations is enclosed.

Under the Act, you have an opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In addition, the Commission has issued the attached order which requires you to appear and give sworn testimony on February 17, 1980, at 10 a.m. The issuance of this order will assist the Commission in carrying out its statutory duty of supervising compliance with the Act. You may consult with your attorney and have an attorney present with you at the deposition.

RB
2/28/80

Letter to: Honorable Julia R. de Vincenti
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Robert Bogin, the attorney assigned to this matter at (202) 423-4073. For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act.

Sincerely,

Enclosures

1. Summary of Possible Violations
2. Order
3. Procedures

cc: Rafael Geigel

31710234733

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Julita Rivera de Vincenti) PRE-MUR 50

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on February 26, 1980, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in PRE-MUR 50:

1. Open a Matter Under Review.
2. Find reason to believe that Julita Rivera de Vincenti may have violated 2 U.S.C. §441b and §441f, and send out a letter of notification.
3. Authorize the taking of deposition of Mrs. Vincenti, Guilda Julia, Polly Alemnay and Rafael Fuentes and send out letters of notification.

Commissioners Aikens, Friedersdorf, Harris, McGarry, and Reiche voted affirmatively for the decision; Commissioner Tieman was not present at the time of the vote.

Attest:

2-28-80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

317103331



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, DC 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*

DATE: FEBRUARY 28, 1980

SUBJECT: ORDERS IN RELATION TO MUR 1181 (Pre-MUR 50)

The attached orders (3), approved in Executive Session on February 26, 1980 by a vote of 5-0, have been signed and sealed this date.

ATTACHMENTS:

Orders:

1) G. Julia: 2) P. Alemany: 3) R. Fuentes

February 19, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: Pre MUR 50

Please have the attached First GC Report distributed to the Commission on a 48 hour tally basis. Thank you.

31710:31736

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20003

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 2-15-80

MUR # Pre-MUR 50
STAFF MEMBER(S) Robert Boqin

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Julita Rivera de Vincenti

RELEVANT STATUTE: 2 U.S.C. §§ 441b and 441f

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Respondent, state chairman of the George Bush for President Committee ("Committee") in Puerto Rico, may have violated 2 U.S.C. §441b by knowingly receiving corporate contributions and §441f by making contributions in the name of other persons.

In a letter dated January 25, 1980, (attachment A) the General Counsel of the George Bush for President Committee voluntarily provided information to the Commission concerning possible violations of the Federal Election Campaign Act of 1971, as amended, (the "Act") by the Committee's state chairman in Puerto Rico among others. Specifically, counsel for the Committee informed our office that the Committee chairman in Puerto Rico, Mrs. Julita Rivera de Vincenti received money from various corporations and contributed it to the George Bush for President Committee in the names of persons other than the corporation.

The Committee relates that it learned of a possible violation on or about November 19, 1979, when it received a letter from Mrs. Guilda Julia in response to a Committee form letter which sought confirmation that a \$1,000 contribution made by money order represented Mrs. Julia's personal funds. Mrs. Julia's letter stated that she "did not personally contribute any amount" but that contributions totalling \$6,000 were made by corporations which she personally owned or controlled. (See Attachments I and II to the Committee's letter). Mrs. Julia further indicated that those corporate checks were made out to "Comite Pro Campana George Bush."

00 FEB 15 AM: 45

Upon receipt of Mrs. Julia's letter, the Committee investigated this matter. After a review of the Committee's records at its headquarters in Houston did not reveal the existence of the corporate checks as described in Mrs. Julia's letter, officials of the Committee telephoned Mrs. Vincenti. During this telephone conversation, Mrs. Vincenti confirmed the information as stated by Mrs. Julia, and the Committee officials subsequently learned that these and other corporate contributions totalling perhaps as much as \$8,800 had been received by Mrs. Julia. A group called Ciudadanous Pro Democracia ("Citizens for Democracy") collected at least \$8,400 of the \$8,800 received from corporate sources. ^{1/} On October 11, 1979, Polly Alemany and Rafael Fuentes, assistants to Mrs. Vincenti at the State Insurance Fund, opened up an account in the name of Ciudadanous Pro Democracia. A total of \$1,900 was deposited in this account with money donated by the following corporations:

1. Coamo Fashions, Inc.	\$ 200.00
2. Ehret, Inc.	200.00
3. Hospital Supply Co.	100.00
4. Pueblo International, Inc.	200.00
5. Puerto Rico Oil Co., Inc,	200.00
6. United Sales Electronic and Service, Inc.	200.00
7. Oliver Realty, Inc.	400.00
8. Colmado Truman, Inc.	<u>400.00</u>
	\$ 1900.00

^{1/} Based on the information provided, it is not clear whether contributions totalling \$400 from Olympic Mills, F & JM Carrera, Inc. and Luna Paint (see page 4 below) were received by Ciudadanous Pro Democracia or were contributed directly to the George Bush for President Committee in the names of executive officers of these corporations.

The \$6,000 in contributions by the corporations owned or controlled by Mrs. Julia, were made out to "Ciudadanos Pro Democracia", contrary to her letter which stated that all the corporate checks were made out to "Comite Pro Compana George Bush". The \$6,000 in checks were cashed and money orders or bank checks in various amounts were issued by the bank and the names of the following individuals were placed on the check or money order by Mrs. Vincenti: 2/

Ruth L. Rodriquez de Acevado	\$ 250
Maria L. Rojas de Almestica	250
John T. Ramirez de Arellano	250
Magdo Colli	250
Rafael Fuentes	250
Guilda Julia	1000
Violeta Paradis	250
Alida Lopez Ramirez	250
Denjiro Rivera Rodriguez	500
Raul Slabin	1000
Gilberto S. Thillet	250
Millie Rodriquez Torres	250
Ovidio Rodriquez Torres	500
Pedro Acevedo Torres	250
Jose A. Vincenti	500
	<u>\$6,000</u>

It was also learned that a personal check from Polly Alemany was comprised of funds derived from the following corporations:

APS International Corporation	\$ 100
Bella International Corporation	100
Casa Elmendorf, Inc.	100

2/ Based on the information provided, all these individuals were notified by Mrs. Vincenti that their names would be used in making contributions to the Committee, and she filled in the contributor card accompanying the contributions with the required contribution information.

Gomez Hermanos, Inc.	100
Luvi Trucking, Inc.	<u>100</u>
	\$ 500

In addition to the above-noted apparent corporate contributions, Mrs. Vincenti apprised the Committee that three additional contributions ostensibly made by individuals were actually provided by the following corporations:

1. Olympic Mills	\$ 100.00
2. F & J. M. Carrera, Inc.	200.00
3. Luna Paint	<u>100.00</u>
	\$ 400.00

Upon completion of its investigation, the Committee took steps to remedy the situation. Letters were written to each of the individual contributors involved advising them that the source of this contribution was apparently derived from corporate funds and that the Committee could not legally accept them. The Committee has refunded a total of \$6,000 to the corporations identified by Mrs. Guilda Julia. In addition, refunds totalling \$1,900 were given to those corporations whose money was deposited in the Ciudadanous Pro Democracia account. 3/ On January 14, 1979, the Committee refunded the three contributions made with money supplied by Olympic Mills, F. & J. M. Carrera, Inc. and Luna Paint. The five corporations whose funds comprised the contribution made by Polly Alemany have or will receive their refunds shortly.

In summary, the George Bush for President Committee refunded, or caused to be returned a total of \$8,800 to the twenty-eight (28) corporations involved in this matter.

FACTUAL AND LEGAL ANALYSIS

Based on the information provided by the Committee it is apparent that Mrs. Vincenti knowingly received money from corporations

3/ Mrs. Vincenti refunded \$400 each to Oliver Realty, Inc., and Colmado Truman, Inc. upon closing out the account. A total of \$447.98 was drawn from the account for expenditures for stamps, food and soft drinks. Additional cash totalling \$152.00 was given to Jeb Bush and was subsequently used in the refunding of corporate monies. This activity totals \$1,400 out of the \$1,900 deposited. At this time, we do not know how the remaining \$500 was spent. (See chart Attachment B).

and that she forwarded most of these corporate funds to the Committee's national headquarters as contributions made in the names of individuals. Should the information provided by the Committee be confirmed, Mrs. Vincenti would have violated 2 U.S.C. §§ 441b and 441f.

2 U.S.C. §441b makes it unlawful for any corporation to make a contribution or expenditure in connection with any election or for any candidate, political committee or other person knowingly to accept or receive any contribution prohibited by 2 U.S.C. §441b. It would appear that Mrs. Vincenti received apparent corporate monies and used these funds to make contributions in connection with a Presidential primary election. Thus, we recommend that the Commission initiate a matter under review and find reason to believe that Mrs. Vincenti may have violated 2 U.S.C. § 441b.

2 U.S.C. §441f prohibits a person from making a contribution in the name of another person. It would appear that Mrs. Vincenti made contributions from apparent corporate contributions in the names of at least fifteen individuals. Thus, the Commission should find reason to believe that Mrs. Vincenti may have violated 2 U.S.C. § 441f.

The Committee's internal investigation revealed a total of 28 corporate contributors. None of those corporations gave more than \$500. Until the Commission learns more about the representations made by Committee officials in securing the contributions, 4/ we recommend that no finding be made at this time as to the corporate contributors. Prior to making a recommendation as to the nineteen individuals who may have permitted their names to be used in making contributions with apparent corporate funds, the Office of General Counsel recommends that we proceed with the investigation of Mrs. Vincenti and Mrs. Julia in order to establish what representation may have been made. 5/

The George Bush for President Committee has voluntarily brought this matter to the Commission's attention and has refunded and accounted for all the apparent prohibited transactions mentioned in this report. At this time, we are not making recommendations as to any officials of the Committee other than Mrs. Vincenti in that the information provided only indicates that Mrs. Vincenti had knowledge as to the actual source of the prohibited

4/ The contributions from the corporate donors were by check made out to Ciudadanous Pro Democracia. At this time it is not clear whether the corporations knew that their money would be expended in connection with a federal election. Under the state laws of Puerto Rico, corporate contributions are permissable.

5/ We have not made a recommendation as to Polly Alemany pending further investigation of her relationship to Mrs. Vincenti.

contributions. Although Mrs. Vincenti is a committee official, we do not believe there is a sufficient basis for imputing her knowledge to the Committee as to a possible violation of 2 U.S.C. § 441f. Thus, unless or until further investigation proves otherwise, we recommend that the Commission make no finding as to the Committee at this time.

In order to proceed with this investigation expeditiously, we recommend taking the deposition of Mrs. Vincenti, Mrs. Julia, Mrs. Alemany and Rafael Fuentes. Upon review of these depositions, this Office will be in a better position to recommend whether further action, if any, is necessary in this matter. We will also request Committee officials to ascertain the disposition of the unaccounted for \$500.

Recommendations

1. Open a Matter Under Review.
2. Find reason to believe that Julita Rivera de Vincenti may have violated 2 U.S.C. §441b and §441f, and send out a letter of notification.
3. Authorize the taking of deposition of Mrs. Vincenti, Guilda Julia, Polly Alemany and Rafael Fuentes and send out letters of notification.

Attachments

1. Letter from Committee
2. Chart
3. Letter to Mrs. Vincenti
4. Authorization for deposition
5. Orders
6. Three letters of notification to witnesses

GEORGE BUSH FOR PRESIDENT

Attachment "A"

PRE MUR 50

6000 file

~~SECRET~~

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 25, 1980

CONFIDENTIAL

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

Dear Mr. Steele:

Within the recent past a situation has been brought to the attention of the George Bush for President committee ("George Bush for President" or "Committee") involving certain ostensibly individual contributions from citizens of Puerto Rico which in fact have their genesis in corporate funds. Upon receipt of this information, George Bush for President initiated an immediate inquiry into this matter in an attempt to verify and ascertain the status of those contributions. In this connection, and at the behest of both the campaign manager and the treasurer (James A. Baker III, and Thomas M. Roberts, respectively) the undersigned has attempted to trace the source of such contributions and to resolve the matter as quickly as possible.

In the course of that inquiry, I have obtained the following information, while verifying that indeed certain contributions were made to George Bush for President which were actually undisclosed corporate contributions and not those of the individuals whose names accompanied the actual contributions. In view of the facts and circumstances surrounding this matter, and in accordance with the notice to all candidates and committees regarding the treatment of corporate contributions, George Bush for President believes it appropriate that it bring this matter directly and voluntarily to the immediate attention of the Federal Election Commission ("Commission"). Accordingly, I submit herewith the following summary, describing the efforts which George Bush for President has made to ascertain the status of these contributions, and the steps the Committee has taken to promptly rectify the situation.

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I. Procedures to Estop Corporate Contributions

In order to comply with the prohibition in the Federal Election Campaign Act of 1971, as amended, and the Regulations of the Commission promulgated thereunder, regarding the solicitation and/or acceptance of corporate contributions, George Bush for President early instituted several procedures in order to avoid the inadvertent solicitation and/or acceptance of such prohibited contributions.

First, in order to avoid any inadvertent solicitation of corporate contributions, my office has provided legal materials to the Committee's State Finance and Campaign Chairmen relating to the Federal election campaign laws. Certain of this material has been distributed directly by mail upon the appointment of each such state chairman and meetings have been held for the finance chairmen, wherein certain legal materials and information have been distributed. In addition, the State Campaign and Finance chairmen are asked to select a State Legal Counsel to coordinate matters relating, inter alia, to the Federal election campaign laws.

Second, internal processing and accounting control procedures have been developed, within the Houston office of the Committee, to intercept and immediately return any corporate checks which are inadvertently forwarded to the Committee.

Third, with regard to contributions that are received from individuals, the Committee has established certain procedures whereby standard form letters are immediately sent to confirm each contribution both as to the amount and as to the nature of each contribution. In particular, George Bush for President has a so-called "signature letter" (i.e. standard letter No. 9), which is mailed upon receipt of an individual contribution to confirm two statements: (1) The account upon which the check was drawn is not controlled by an incorporated organization; (2) The contribution represents the personal funds of the contributor (Attachment No. 1). This letter is used in all cases such as the instant case, in which the contribution is not received in the form of a personal check but is received in some other form (e.g. a money order).

In sum, George Bush for President has taken all reasonable efforts to devise and implement a system whereby the key people in its fundraising and campaign organization, on a state-by-state basis, are apprised of the fundamental proscriptions in the Act. Moreover, internal controls have been established to identify and return any inadvertent contributions of an unacceptable nature which are forwarded to the Committee.

II. Puerto Rico - Presidential Primary

The 1980 Presidential primary election for the Republican nomination for President of the United States is the first presidential primary ever held in the Commonwealth of Puerto Rico. As another matter of fact, corporate contributions have been long permissible and commonly solicited in local elections in Puerto Rico. Moreover, as you are probably aware, unlike the situation generally in the United States, political activism and participation in local politics is considerably intense in Puerto Rico. In particular, there currently is a high degree of interest, involvement and passion involved in the issue of Statehood for Puerto Rico and on the interaction of that issue with the Presidential preference primary to take place on February 17, 1980. It is in this general and broad context that we believe the following facts and circumstances must be placed in order to understand the instant situation.

III. Puerto Rico - Fundraising Activities

On or about November 19, 1979, the Houston office of George Bush for President received a November 15 letter, addressed to the campaign chairman, from Mrs. Guilda Julia in Puerto Rico (Attachment No. 2). This letter was obviously sent in response to a standard Committee confirmation letter regarding a contribution of \$1,000 in the name of Mrs. Julia. In that letter Mrs. Julia stated that she "did not personally contribute any amount" but that contributions of \$500 apiece were made by each of the twelve (12) listed corporations which she personally owned or controlled. In addition, she indicated that these corporate checks were made out to "Comite Pro Campana George Bush."

IV. George Bush for President - Corrective Action

Upon receipt of this letter, the situation was immediately brought to the attention of both Messrs. Baker and Roberts, as well as Jeb Bush. Jeb Bush is one of Ambassador Bush's sons and is actively involved in the presidential primary campaign in Puerto Rico. George Bush for President immediately initiated an inquiry into the facts and circumstances surrounding this matter and took the following actions.

First, Messrs. Baker and Roberts called the undersigned and advised of the situation. Second, a review was made of the contributions that had been received from contributors in Puerto Rico to determine whether or not any such indicated corporate checks had in fact been received by the Committee. Third, the campaign's chairman in Puerto Rico, Mrs. Julita Rivera de Vincenti, was immediately contacted for the purposes of reviewing this matter and taking prompt steps to remedy the situation if it were determined that such contri-

Contributions had in fact been made by the stated corporations.

The review of the contribution records of George Bush for President did not reveal any such checks made out to "Comite Pro Campana George Bush", nor did it reflect any contributions from the twelve corporations listed in Mrs. Julia's letter. However, upon telephoning Mrs. Vincenti, it was learned that, in fact, certain contributions had been forwarded in the name of named individuals which were actually funds contributed by the named companies, as well as certain other corporations. In view of these statements, and in view of Jeb Bush's fluency in Spanish, he was asked to discuss this matter with Mrs. Vincenti and other campaign personnel to determine the complete factual background surrounding these contributions. Mr. Bush attempted to do this by telephone during the period from November 21 to December 4, 1979. Because of the holiday period and the difficulty in resolving a matter of this nature over long-distance telephone, Mr. Bush went to San Juan, Puerto Rico on December 6th and met the next day with Mrs. Vincenti and the Vice-Chairman of the Puerto Rican campaign, Anthony Rodriguez, to develop the underlying facts.

Mr. Bush prepared a memorandum, dated December 18, 1979, at my request summarizing the facts and information derived through his discussion and meetings with Mrs. Vincenti in Puerto Rico on December 7th. Following this discussion, at which Mr. Bush confirmed that certain corporate contributions had indeed been forwarded to George Bush for President as individual contributions primarily in the form of money orders with accompanying individual contribution cards, George Bush for President immediately attempted to identify the companies which were the sources of such contributions and to return them forthwith. In addition, as it appeared that the campaign chairman of the Puerto Rican Committee had knowledge of such contributions at the time they were forwarded to Houston, but did not apparently understand the nature of her action with regard to such unacceptable contributions, the Committee immediately assigned the Vice-Chairman the role and responsibility of Finance Chairman while the inquiry continued. Moreover, following receipt of further specific information with regard to the corporate funds involved, the Treasurer's office in Houston attempted to make a complete summary analysis and trace of said unacceptable contributions. These worksheets reflect the following information: (a) The disposition and return of the funds which were determined to be corporate funds and the proposed manner of disclosure and reporting on the January 31 FEC Report; (b) Referenced list of individual contributors and the amount and date of contribution subject to the inquiry; (c) copies of said individuals' contribution

cards and money orders; including a personal check from Polly Alemany; (d) Copies of the corporate checks written to the order of "Ciudadanos Pro Democracia"; (e) summary of individuals and companies involved in transactions. Copies of such memoranda and worksheets are attached herewith for your information and convenience (Attachment No. 4a-g).

Following preparation of these worksheets and the accounting analysis made by the Treasurer's office, it was determined that I should personally go to Puerto Rico, along with Jeb Bush, and in some detail again completely review and attempt to document the facts and circumstances surrounding the solicitation and forwarding of such undisclosed corporate contributions. On December 23, 1979, I flew to Puerto Rico to attend a meeting with Mrs. Vincenti and certain other persons listed below. Following is a summary of the information I obtained and the events resulting in these questioned transactions as described to me during the course of that meeting.

The meeting was attended by Mrs. Vincenti; Anthony Rodriguez, Vice-Chairman and Finance Chairman of George Bush for President; Ovidio Rodriguez, Assistant Chairman of the Committee; and Rafael Geigel Vassallo, an attorney with the firm of Chapman, Duff and Paul, in both Puerto Rico and Washington, D.C. Mrs. Vincenti was selected as campaign manager for the Bush campaign in Puerto Rico in January of 1979. In June 1979, Mrs. Vincenti and Mr. Rodriguez travelled to the Houston office of George Bush for President to see the headquarters and discuss the campaign. During that visit they received a copy of the financial "bluebook", which set forth the State accounting and fundraising procedures to be followed by the Committee Finance Chairmen and which was distributed at a meeting of Finance Chairmen held in Houston early in April. No one from Puerto Rico attended that first organizational meeting.

Mrs. Vincenti was apparently chosen as campaign manager because of her extensive involvement in Puerto Rican politics over a long period of time. Mrs. Vincenti has a Ph.D. from Cornell in collective bargaining and management, and had taught at the University of Puerto Rico prior to becoming Puerto Rican Secretary of Labor from 1969 through 1972. From 1973 through 1977 she was Director of Human Resources for the Municipal Government of San Juan, and since 1977 has served as a member of the Cabinet and as Administrator of the State Insurance Fund.

During the period from early July through mid-August of 1979, Mrs. Vincenti and Mr. Rodriguez sought to obtain the services of a Finance Director or Chairman to coordinate the fundraising efforts in the Puerto Rican campaign. During that

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I was advised that, although no funds from the newly formed committee and/or bank account were utilized for purposes other than George Bush, if they had had the time and the committee had been in existence for a longer period of time, the funds would have been used to contribute to the National Republican Party and to educate the populace with regard to the procedures to be followed regarding the advent of the first Puerto Rican presidential primary.

The details regarding the setting up of the committee account are set forth in Jeb Bush's memorandum of December 18, 1979. In sum, an account in the name of "Ciudadanos Pro Democracia" (i.e. "Citizens for Democracy") was opened on October 11th at the Banco de Ponce (Account No. 29-073590-5). As indicated in the copy of the bank deposit book, an initial deposit of \$1,500 was made on that date, and an additional deposit of \$400 was made on October 26, 1979. Moreover, the \$6,000 in contributions in the amount of \$500 each by twelve corporations owned or controlled by Mrs. Julia was made to the order of the committee and not George Bush for President. However, the checks were not actually deposited in said account. On the contrary, apparently the \$6,000 in checks were cashed at the Banco de Ponce and money orders or bank checks in various amounts were issued by the bank. The \$1,900 in funds actually deposited in said accounts were received from the following corporations in the amounts respectively set forth next to their name:

- | | |
|---|----------|
| 1. Coamo Fashions, Inc. | \$200.00 |
| 2. Ehret, Inc. | 200.00 |
| 3. Hospital Supply Co. | 100.00 |
| 4. Pueblo International, Inc. | 200.00 |
| 5. Puerto Rico Oil, Inc. | 200.00 |
| 6. United Sales Electronic &
Service, Inc. | 200.00 |

The additional two corporate contributions of \$400 each to said account in the aggregate amount of \$800 were provided by the following two corporations on the dates set forth next to their name:

- | | |
|---|-----------------|
| 1. Oliver Realty, Inc.
Box 1173
Arcibo, Puerto Rico 00612 | October 5, 1979 |
| 2. Colmado Truman, Inc.
Provisiones Yucoros
Avenida Borsa
Haito Rey, Puerto Rico | October 8, 1979 |

The independent committee account at the Banco de Ponce was established by Polly Alemany and Rafael Fuentes, both of whom

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period they spoke with three candidates (i.e. Messrs. R. Gonzales, W. Gonzales and Liliana) for Finance Director, but the Committee was turned down on the basis that the people did not have adequate time available to handle such a task. At that time Houston had not as yet provided any budget for the Puerto Rico campaign. Accordingly, a member of the National staff, Fred Bush, suggested that a fundraising event be held in Puerto Rico to provide funds.

It was determined by the Bush Steering Committee in Puerto Rico that a cocktail party should be held on September 6, 1979. Invitations were printed and various individuals were given responsibility for solicitation of individuals to the cocktail party. Most of the solicitation effort was by telephone and other personal contact. No corporation was directly solicited for contributions or the sale of tickets to this function. However, I was advised that several of these individuals believed that, although they could not directly accept corporate contributions, they could sell tickets to such an event to corporate executives and accept corporate checks. Nonetheless, upon the receipt of certain corporate checks by the campaign officials in Puerto Rico, Tony Rodriguez quickly reminded such persons that they could not accept any such corporate contributions and the checks were returned to the corporate officers.

I was again advised at this time that it was very common practice in Puerto Rico to accept corporate contributions with regard to all local political campaigns. Moreover, it apparently has seldom been that advertisements are used for the solicitation of contributions. Instead parties, and other fundraising activities, are most often utilized for the purpose of raising funds for local campaigns. I was further advised that it was usual to set up independent committees for general political purposes, as well as to earmark expenditures for use in a local area and/or for a particular purpose. It was in this manner and in this context that Citizens for a Democracy was established.

In particular, the idea for such a committee was suggested from the floor, at a regular Wednesday meeting of the Bush Steering Committee attended by approximately 30-50 people. Mrs. Vincenti chaired that meeting and thought that the suggestion was a good one and was legally permissible. In view of the common practice in Puerto Rico of forming such independent committees it was presumed to be permissible and no question was raised as to its legality at the meeting. Mr. Rodriguez did not attend that meeting and was apparently not asked for his opinion on the formation of this committee. Neither were Jeb Bush nor the national office of George Bush for President advised of this proposed action.

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are assistants to Mrs. Vincenti at the State Insurance Fund. It is my understanding that the contributions which were solicited for this committee account were made by the same individuals who originally received the unacceptable corporate contributions. It is also my understanding that the contributors indicated that they were making the contribution to this Committee for use by George Bush and in any other manner the Committee might desire to utilize said monies, including promotion of Statehood and the National Republican Party.

The distribution of \$7,900 was traced by Mr. Bush and myself as follows:

1. \$6,500 was forwarded to George Bush for President in Houston by money orders and a personal check from Polly Alemany in the names of sixteen (16) individuals. Contribution cards were filled in by Mrs. Vincenti and others representing such contributions as individual contributions. Mrs. Vincenti indicated that she personally spoke with all of the individuals involved whoses names were used on the contribution cards and that all such individuals indicated their willingness to have there names utilized for this purpose. It was Mrs. Vincenti's misunderstandings that monies from such an independent committee could be utilized in this manner, and that such individual contributions could be accepted by the Committee.

2. Certain expenses totalling \$447.98 were paid from funds from the account. This included expenditures of \$300 for stamps, \$100 for soft drinks, and \$47.98 for food. The stamps were utilized in a mailing to potential delegates. Additional cash totalling \$152.02 was given to Jeb Bush. (This was subsequently converted into a money order and returned to one of the corporations, as described below.) The balance of \$800 was the closing balance of the account and was taken by Mrs. Vincenti to return to Oliver Realty, Inc. and Calmado Truman, Inc.

At the end of our interview, Mrs. Vincenti stated that she had not realized that the formation of such a committee, and the acceptance of corporate contributions for such general political purposes, would be in violation of the Federal election campaign laws. She expressed great dismay and disappointment that she or the committee had done anything which in any way might prove embarassing to Ambassador Bush. She explained, in general, that from the time of the planning of the cocktail party through December she and other members of the campaign had been personally involved with an extraordinary array of major political events occuring in Puerto Rico. In particular, she noted that, in September, they were active with the Governor's birthday party, a fundraiser for the Mayor, and a fund-

raiser for the Speaker of the House. In November, they were involved with a new Progressive Party function and a kick-off for Mayor Padilla. And finally, in December, they were caught us with the holidays and coordination and preparation of a Caravan for George Bush throughout Puerto Rico which occurred at the end of December. At the close of the meeting Mrs. Vincenti indicated she would do whatever was necessary to clear up this matter with the campaign and the Commission.

In addition to the above-mentioned corporate contributions, Mrs. Vincenti was asked to review the list of contributors from Puerto Rico which I provided from the Houston office (Attachment No. 5). She was able to determine that three additional individual contributions, in the aggregate amount of \$400, was actually provided by three corporations. She identified the individual contributors and the companies as follows:

1. Francisco Carvajal	Olympic Mills	\$100.00
2. Francisco M. Carrera	F.&J.M. Carrera, Inc.	200.00
3. S. Luna	Luna Paint	100.00

A review of the contribution information listed on our computer print-out sheets indicated that the address of the individuals listed in these instances were the same as that of the company of which each of the respective gentlemen were President and/or Chief Executive Officer.

V. George Bush for President - Return of Unacceptable Contributions.

Upon my return from Puerto Rico, I reviewed the situation with the campaign officials and we took the following further action to remedy the situation.

First, letters were written to each of the individual contributors involved advising them that we had received information that their contribution was not an individual contribution but that of a corporation (Attachment No. 6). Second, we wrote letters, enclosing appropriate checks, to each of the corporations identified by Mrs. Guilda Julia, returning the \$500 contributions made by them with explanatory letters (Attachment No. 7). Third, we returned the remaining monies to the other identified corporations in the amounts Mrs. Vincenti said had been received by them, along with a money order returning the cash which was carried by Mr. Bush to Houston and which had not been used for out-of-pocket expenses in connection with campaign activities (Attachment No. 8). Fourth, with regard to the three additional companies whose names I did not at first have on my return, a special escrow account was set up in the amount of \$400 to handle the return of that money.

These funds were similarly refunded along with an appropriate accompanying letter on January 14, 1980. Fifth, the contribution of Polly Alemany in the amount of \$500, which was received by personal check by George Bush for President, was held in abeyance until it could be determined whether or not that was actually paid for by corporate funds, and if so to whom the money should be returned. Letters have been drafted to return such contributions upon receipt of such checks by this office from Houston. Sixth, Mrs. Vincenti resigned as Chairwoman of the Puerto Rican campaign committee and that resignation was accepted by the campaign (Attachment No. 9 a and b).

On January 22, 1980, it was learned that Polly Alemany's contribution of \$500 was actually funds given by the following five corporations of \$100 apiece:

1. A.P.S. International Corporation
2. Bella International Corporation
3. Casa Elmendorf, Inc.
4. Gomez Hermanos, Inc.
5. Luvi Trucking, Inc.

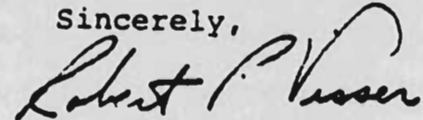
Following all of the above steps, we determined that, in view of the unusual facts and circumstances surrounding this matter, the result of our inquiry should be set forth in the instant memorandum and brought promptly to the attention of the General Counsel's office of the Commission. I believe the Committee has taken every step possible to conduct a prompt and thorough inquiry regarding these unacceptable contributions and has fully satisfied its responsibility under the Federal election campaign laws and regulations.

In addition, following my interview with Mrs. Vincenti, it appears that the formation of this independent Committee for Democracy was the result of a large public Steering Committee meeting which was following procedures typically followed in Puerto Rico elections during a time of intense local and national political activity. There was no finance chairman in charge of such solicitation effort, although active attempts had been made to obtain a finance chairman who would have been directly advised of the applicable Federal election campaign laws and regulations and the procedures mandated by the Committee. In view of the critical fact that this is Puerto Rico's first presidential primary election, and the extraordinarily intense political activism involved in the Commonwealth of Puerto Rico, it appears that the confusion engendered by the activities of this independent committee has been quickly controlled and rectified. Mrs. Vincenti has been fully cooperative with the Committee's efforts to resolve this matter and has expressed her complete willingness to discuss this matter with any representative of the Federal Election Commission, either in

Washington or in Puerto Rico.

George Bush for President will, of course, be pleased to review this matter with you if you so desire and to answer any further questions you may have.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc

cc: James A. Baker, III
Thomas M. Roberts
Mrs. Julia Rivera de Vincenti
Rafael Geigel Vassallo, Esq.

31710:3:103

**George Bush
for President.**

710 North Post Oak Road, Houston
Texas 77024 (713)467-1980

Dear

Thank you so very much for your generous contribution to George Bush for President. Mr. Bush is extremely grateful for your support.

The Federal Election Commission requires that we have the signature of each contributor as well as the contributor's confirmation of the following statements:

- 1) The account upon which the check was drawn is not controlled by an incorporated organization.
- 2) The contribution represents the personal funds of the contributor.

Please sign your name in the space provided if the above information is correct. Once again, thank you for your help.

Sincerely,

Pat Halla
Treasurer's Office

I made a contribution in the amount of _____ to George Bush for President and the above statements 1) and 2) are correct.

(Signature of contributor)

(Date)

Enclosed letter # 9 - "signature" letter.

ATTACHMENT No. 1

NOV 19 1979

GILDA JULIÁ
P. O. BOX 11605
SANTURCE, P. R. 00910

November 15, 1979

Mr. James A. Baker, III, Chairman
George Bush for President
710 North Post Oak Road
Suite 208
Houston, Texas 77024

Dear Mr. Baker:

I am returning your letter requesting confirmation of contributions to George Bush for President because:

1. I did not personally contribute any amount
2. Contributions of \$500.00 each were made by the following Corporations, of which I personally own a majority of the stock, or all the stock
 - a. San Juan Realty Corporation
 - b. Industrial Warehouses, Inc.
 - c. City Enterprises, Inc.
 - d. Almac Enterprises, Inc.
 - e. Castle Enterprises, Inc.
 - f. Girafa, Inc.
 - g. Silver, Inc.
 - h. Triple A Investment, Inc.
 - i. Leasing & Brokerage, Inc.
 - j. Gateway Plaza, Inc.
 - k. Puerto Nuevo Distribution Center, Inc.

Attachment No. 2

Mr. James A. Baker, III

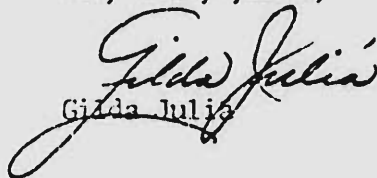
- 2 -

November 15, 1979

1. Puerto Nuevo Development Corporation

3. All checks were made out to: "Comité Pro Campaña George Bush"

Very truly yours,


Gilda Julia

aet

Enclosure

31710236105

ATTACHMENT B

CHART

Corporate Monies In and Refunded

12 Julia corps.	6,000
8 corps to account	1,900
5 corps to Alemany	500
3 corps by Pres.	<u>400</u>
	8,800

Corporate Monies Accounted

19 contributions in name of another	\$6,900
expenditures for Committee (food, drink, stamps)	447.98
money refunded by Mrs. Vincenti	800.00
money turned over to J. Bush	<u>152.02</u>
	\$8,300.00

Thus, \$500 not accounted for all this time.

31710:31107



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Julia R. de Vincenti
762 Lopez Sicardo Avenue
Dos Pinos, Rio Piedras
Puerto Rico 00923

Re: MUR

Dear Mrs. Vincenti:

The Commission is in receipt of the letter written by Robert P. Visser, General Counsel to the George Bush for President Committee to Charles N. Steele the General Counsel of the Federal Election Commission dated January 25, 1980, of which you were to be sent a copy. Based on that letter, the Commission on February , 1980, found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, (the "Act"), and and directed the Office of the General Counsel to conduct an investigation of this matter. Specifically, the Commission found that you may have violated 2 U.S.C. §441b and §441f by knowingly receiving contributions from corporations and using these monies to make contributions to the George Bush for President Committee in the names of others. A summary of the possible violations is enclosed.

Under the Act, you have an opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In addition, the Commission has issued the attached order which requires you to appear and give sworn testimony on February 27, 1980, at 10 a.m. The issuance of this order will assist the Commission in carrying out its statutory duty of supervising compliance with the Act. You may consult with your attorney and have an attorney present with you at the deposition.

Letter to: Honorable Julia R. de Vincenti
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Robert Bogin, the attorney assigned to this matter at (202) 423-4073. For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act.

Sincerely,

Enclosures

1. Summary of Possible Violations
2. Order
3. Procedures

cc: Rafael Geigel

31010:31002

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. _____
STAFF MEMBER & TEL.. NO.
Robert Bogin

RESPONDENT Julita R. de Vincenti

(202) 523-4073

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

Based on information supplied to the Commission by the George Bush for President Committee, the Commission has made findings with respect to contributions made to the George Bush for President Committee.

PRELIMINARY FACTUAL BASIS
AND LEGAL ANALYSIS

2 U.S.C. §441b makes it unlawful for any corporation to make a contribution or expenditure in connection with any federal election, or for any person knowingly to accept or receive any contribution prohibited by §441b. From the information provided, it appears that you received contributions from various corporations owned or controlled by Guilda Julia among others, and that you used these corporate funds to make contributions in connection with the presidential primary election of George Bush.

2 U.S.C. §441f prohibits a person from making a contribution in the name of another person. It would appear that upon receiving the aforementioned corporate contributions, you made contributions to the George Bush for President Committee with these funds in the names of at least fifteen individuals.

FINDINGS

Based on the foregoing analysis, the Federal Election Commission has found reason to believe that you may have violated 2 U.S.C. §§441b and 441f.

31710131110



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE ORDERS

The Commission hereby authorizes the issuance of orders
to the following persons in connection with MUR

Julia R. De Vincenti
762 Lopez Sicardo Avenue
Dos Pinos, Rio Piedras
Puerto Rico 00923

Gilda Julia
P.O. Box 11605
Santurce, Puerto Rico
00910

Rafael Fuentes
Cond. Garden Hill Plaza Apt. 504
Cond. Garden Hill Plaza I
Guaynabo, Puerto Rico 00657

Polly Alemany
136 Amazonas Street.
U.P.B. El Paraiso
Rio Piedras, Puerto Rico
00926

Robert O. Tiernan
Chairman

Thomas E. Harris
Commissioner

Max L. Friedersdorf
Vice Chairman

John W. McGarry
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Order to Appear for Deposition Upon
Oral Examination

TO: Julia R. de Vincenti
762 Lopez Sicardo Avenue
Dos Pinos, Rio Piedras
Puerto Rico 00923

RE: MUR

At the instance of The Federal Election Commission,
pursuant to 2 U.S.C. §437d(a)(4), you are hereby ordered to
appear for deposition in connection with the Commission's
investigation of possible violations of the Federal Election
Campaign Act of 1971, as amended.

Notice is hereby given that the deposition is to be
taken at 1325 K Street, N.W., Washington, D.C., 7th Floor
at 10:00 a.m. on Wednesday, February 27, 1980, and any and all
dates adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., on the
day of _____ 1980.

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

MARJORIE W. EMMONS
SECRETARY TO THE COMMISSION

31740:33113

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Order to Appear for Deposition Upon
Oral Examination

TO: Guilda Julia
P.O. Box 11605
Santurce, Puerto Rico 00910

RE: MUR

At the instance of The Federal Election Commission,
pursuant to 2 U.S.C. §437d(a)(4), you are hereby ordered to
appear for deposition in connection with the Commission's
investigation of possible violations of the Federal Election
Campaign Act of 1971, as amended.

Notice is hereby given that the deposition is to be
taken at
at 3:00 p.m. on Wednesday, March 5, 1980, and any and all dates
adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., on the
day of 1980.

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

MARJORIE W. EMMONS
SECRETARY TO THE COMMISSION

310403113

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Order to Appear for Deposition Upon
Oral Examination

TO: Rafael Fuentes
Cond. Garden Hill Plaza Apt. 504
Cond. Garden Hill Plaza 1
Guaynabo, Puerto Rico 00657

RE: MUR

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4
At the instance of The Federal Election Commission,
pursuant to 2 U.S.C. §437d(a)(4), you are hereby ordered to
appear for deposition in connection with the Commission's
investigation of possible violations of the Federal Election
Campaign Act of 1971, as amended.

Notice is hereby given that the deposition is to be
taken at
at 3:00 p.m. on Tuesday, March 4, 1980, and any and all dates
adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., on the
day of 1980.

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

MARJORIE W. EMMONS
SECRETARY TO THE COMMISSION

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Order to Appear for Deposition Upon
Oral Examination

TO: Polly Alemany
136 Amazonas Street
U.P.B. El Paraiso
Rio Piedras, Puerto Rico 00926

RE: MUR

At the instance of The Federal Election Commission,
pursuant to 2 U.S.C. §437d(a)(4), you are hereby ordered to
appear for deposition in connection with the Commission's
investigation of possible violations of the Federal Election
Campaign Act of 1971, as amended.

Notice is hereby given that the deposition is to be
taken at
at 10:00 a.m. on Wednesday, March 5, 1980, and any and all dates
adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., on the
day of 1980.

Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

MARJORIE W. EMMONS
SECRETARY TO THE COMMISSION



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rafael Fuentes
Cond. Garden Hill Plaza Apt. 504
Cond. Garden Hill Plaza I
Guaynabo, Puerto Rico 00657

RE: MUR

Dear Mr. Fuentes:

In connection with an investigation being conducted by the Federal Election Commission, please find enclosed an order requesting your appearance for deposition on March 4 at 3 p.m. By issuing this order, the Commission is seeking information concerning Ciudadanous Pro Democracia and the George Bush for President Committee.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. Pursuant to Commission regulation (11 C.F.R. §111.12), please find enclosed witness fees and mileage for your attendance.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at 202/523-4073.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Order
Witness Fees



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Polly Alemany
136 Amazonas Street
U.P.B. El Paraiso
Rio Piedras, Puerto Rico 00926

RE: MUR

Dear Ms. Alemany:

In connection with an investigation being conducted by the Federal Election Commission, please find enclosed an order requesting your appearance for deposition on March 5 at 10 a.m. By issuing this order, the Commission is seeking information concerning Ciudadanous Pro Democracia and the George Bush for President Committee.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. Pursuant to Commission regulation (11 C.F.R. §111.12), please find enclosed witness fees and mileage for your attendance.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at 202/523-4073.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Order
Witness Fees



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gilda Julia
P.O. Box 11605
Santurce, Puerto Rico
00910

RE: MUR

Dear

In connection with an investigation being conducted by the Federal Election Commission, please find enclosed an order requesting your appearance for deposition on March 5 at 3 p.m. By issuing this order, the Commission is seeking information concerning Ciudadanous Pro Democracia and the George Bush for President Committee.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. Pursuant to Commission regulation (11 C.F.R. §111.12), please find enclosed witness fees and mileage for your attendance.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter, at 202/523-4073.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Order
Witness Fees

1900#
254

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 28, 1980

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Steele:

With regard to our discussion last Friday, this is to advise you that we have today forwarded letters to Polly Alemany and each of the corporations which provided \$500.00, in the aggregate, to her which funds were subsequently forwarded to George Bush for President. As indicated, checks in the amount of \$100.00 were forwarded to each of the following five corporations:

1. A.P.S. International Corporation;
 2. Bella International Corporation;
 3. Casa Elmendorf, Inc.;
 4. Gomez Hermanos, Inc.;
 5. Luvi Trucking, Inc.
- 10/1/80
15:28

This is also to advise you that we have received returns on the registered mail sent to Mr. Alfredo Ramirez de Arellano and Miss Maria L. Rojas de Almestica. I have advised Mrs. Vincenti's attorney, Rafael Geigel Vassallo of this and am attempting to determine a correct address with which to again forward these letters.

This is also to confirm that I have requested Mr. Geigel to attempt to obtain a copy of the original corporate checks which were given to the Puerto Rican committee's volunteers during their solicitation for the fundraiser in September of 1979. As these checks were returned and not accepted or cashed, they may not currently be available. In any event, I have asked Mr. Geigel to obtain the facts and circumstances, including the dates that the donations were made and returned.

Charles N. Steel Esq.
January 28, 1980
Page 2

If I can be of any further assistance with regard to this matter please do not hesitate to contact me.

Sincerely,

Robert P. Visser

Robert P. Visser (gc)
General Counsel

010000010100

RPV:jc
cc: James A. Baker, III
Thomas M. Roberts
encls.

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 25, 1980

Ms. Polly Rodriguez Alemany
Calle Amazonas 136 - URB, El Paraiso
Rio Piedras, Puerto Rico 00926

Dear Ms. Alemany:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$500.00.

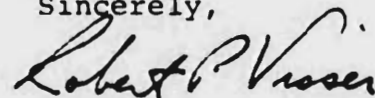
It has recently come to our attention that the funds for such contribution do not represent your personal funds but are those of five corporations which were drawn to the order of Ciudadano Pro Democracia and converted into a personal check which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any Federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person are also prohibited.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 25, 1980

Certified Mail
Return Receipt Requested

A.P.S. International Corporation
P.O. Box 13912
Santurce, Puerto Rico 00908

Gentlemen:

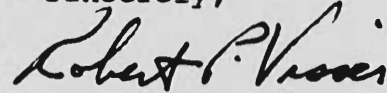
It has recently come to our attention that your company made a contribution of \$100.00 by a check drawn to the order of Ciudadanos Pro Democracia and that such funds were deposited in the personal checking account of a Ms. Polly Alemany. Subsequently, Ms. Alemany contributed such funds, along with \$400.00 in other corporate funds, to George Bush for President. This is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any Federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person are also prohibited. Accordingly, enclosed herewith is our check in the amount of \$100.00 to the order of A.P.S. International Corporation.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

31010131123

RPV:jc
cc: James A. Baker, III
Thomas M. Roberts

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**
PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
BY HOUSTON
888 Main St., Box 205 Houston, Texas 77002

No 5155

Jan 25 1980

PAY **GEORGE BUSH FOR PRESIDENT** **100 00 00** DOLLARS \$100.00

TO
THE
ORDER
OF

A.P.S. International Corp.
P.O.Box 13912
Centurce, Puerto Rico 00908

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

[Handwritten Signature]

⑈00005155⑈ ⑆⑆⑆3000515⑆ ⑆⑆4787⑈

CLARE CHECKS - VM

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
1-25-80	Refund of unacceptable contribution	100.00

No 5155

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

3 1 7 1 0 2 3 1 1

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 25, 1980

Certified Mail
Return Receipt Requested

Bella International Corporation
P.O. Box 816
Haito Rey, Puerto Rico 00919

Gentlemen:

It has recently come to our attention that your company made a contribution of \$100.00 by a check drawn to the order of Ciudadanos Pro Democracia and that such funds were deposited in the personal checking account of a Ms. Polly Alemany. Subsequently, Ms. Alemany contributed such funds, along with \$400.00 in other corporate funds, to George Bush for President. This is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

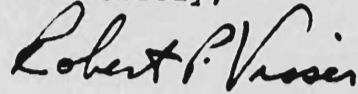
The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any Federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person are also prohibited. Accordingly, enclosed herewith is our check in the amount of \$100.00 to the order of Bella International Corporation.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Bella International Corporation
January 25, 1980
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

31710231125

RPV:jc
cc: James A. Baker, III
Thomas M. Roberts

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**
PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
BY MEMBERSHIP
800 Main St. Box 200 Houston, Texas 77002

No 5151

Jan 25, 1980

PAY **GEORGE BUSH FOR PRESIDENT** 100 00 00 CTS DOLLARS \$ 100.00

TO
THE
ORDER
OF

Bella International Corp.
P.O.Box 816
Hato Rey, Puerto Rico 00919

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

[Handwritten Signature]

⑆00005151⑆ ⑆113000515⑆ 14 4717⑆

CLARKE CHECKS, INC.

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

3171023117

DATE	DESCRIPTION	AMOUNT
1-25-80	Refund of unacceptable contribution	100.00
		No 5151

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 25, 1980

Certified Mail
Return Receipt Requested

Casa Elmendorf, Inc.
San Juan, Puerto Rico

Gentlemen:

It has recently come to our attention that your company made a contribution of \$100.00 by a check drawn to the order of Ciudadanos Pro Democracia and that such funds were deposited in the personal checking account of a Ms. Polly Alemany. Subsequently, Ms. Alemany contributed such funds, along with \$400.00 in other corporate funds, to George Bush for President. This is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

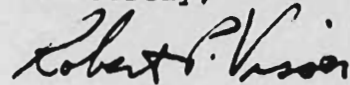
The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any Federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person are also prohibited. Accordingly, enclosed herewith is our check in the amount of \$100.00 to the order of Casa Elmendorf, Inc.

If course, the Bush committee may accept an individual ontribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Casa Elmendo, Inc.
January 25, 1980
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser,
General Counsel

RPV:jc
cc: James A. Baker, III
Thomas M. Roberts

31010131112

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024



No 5152

Jan 25 1980

PAY **GEORGE BUSH FOR PRESIDENT** **100 AND 00/100** DOLLARS \$ 100.00

TO THE ORDER OF Casa Elmendorf Inc.
San Juan, Puerto Rico

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

⑈00005152⑈ ⑆113000515⑆ 14 4767⑈

CLARKE CHECKS

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

31710231150

DATE	DESCRIPTION	AMOUNT
	Refund of unacceptable contribution	100.00
		No 5152

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.



GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 25, 1980

Certified Mail
Return Receipt Requested

Gomez Hermanos, Inc.
P.O. Box 1288
Haito Rey, Puerto Rico 00919

Gentlemen:

It has recently come to our attention that your company made a contribution of \$100.00 by a check drawn to the order of Ciudadanos Pro Democracia and that such funds were deposited in the personal checking account of a Ms. Polly Alemany. Subsequently, Ms. Alemany contributed such funds, along with \$400.00 in other corporate funds, to George Bush for President. This is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

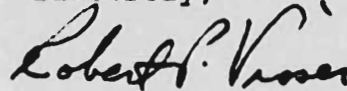
The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any Federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person are also prohibited. Accordingly, enclosed herewith is our check in the amount of \$100.00 to the order of Gomez Hermanos, Inc.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Gomez Hermos, Inc.
January 25, 1980
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

3171023112

RPV:jc
cc: James A. Baker, III
Thomas M. Roberts

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**
PH. 713-GDP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
an Equal Opportunity Lender
200 Main PO Box 200 Houston, Texas 77001

No 5153

Jan 25 19 80

PAY **GEORGE BUSH FOR PRESIDENT** **100** **100** **00** **00** DOLLARS \$ 100.00

TO
THE
ORDER
OF

Gomez Hermanos Inc.
P.O.Box 1288
Hato Rey, Puerto Rico 00919

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

[Handwritten Signature]

⑈00005153⑈ ⑆113000515⑆ 14 4717⑈

CLARKE CHECKS 174

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
1-25-80	Refund of unacceptable contribution	100.00

No 5153

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

317103113

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 25, 1980

Certified Mail
Return Receipt Requested

Luvi Trucking, Inc.
P.O. Box 13425
Santurce, Puerto Rico 00908

Gentlemen:

It has recently come to our attention that your company made a contribution of \$100.00 by a check drawn to the order of Ciudadanos Pro Democracia and that such funds were deposited in the personal checking account of a Ms. Polly Alemany. Subsequently, Ms. Alemany contributed such funds, along with \$400.00 in other corporate funds, to George Bush for President. This is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

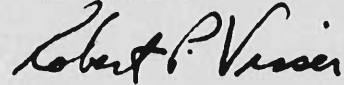
The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any Federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person are also prohibited. Accordingly, enclosed herewith is our check in the amount of \$100.00 to the order of Luvi Trucking, Inc.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Luvi Trucking, Inc.
January 25, 1980
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

31040236133

RPV:jc
cc: James A. Baker, III
Thomas M. Roberts

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**
PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
an Houston
200 Main P.O. Box 200 Houston, Texas 77002

No 5154

Jan 25 1980

PAY **GEORGE BUSH FOR PRESIDENT** **100** **100** **00** CTS DOLLARS \$ 100.00

TO
THE
ORDER
OF

Luvi Trucking Inc.
P.O.Box 13425
Centurce, Puerto Rico 00908

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

[Handwritten Signature]

⑈00005154⑈ ⑆113000515⑆ 14 4717⑈

CLARKE CHECKS VW

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

31740:33155

DATE	DESCRIPTION	AMOUNT
1-25-80	Refund of unacceptable contribution	100.00

No 5154

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT
732 North Washington Street
Alexandria, Virginia 22314

REGISTERED
NO. 344224

Mr. Alfredo Ramirez de Arellano
G.P.O. Box 5028
San Juan, Puerto Rico 00936

REGISTERED MAIL RETURN RECEIPT REQUESTED

RETURN RECEIPT
REQUESTED

Handwritten notes:
7-10-80
4th person no
to keep 3rd no
del Seguro del Estado

3 1 2 1 0 2 3 1 1 2 3

WASHINGTON, D. C. 20501
DEC 28 1979
MAIN OFFICE

~~William H. Webster~~
~~Director~~

WASHINGTON, D. C. 20501
DEC 28 1979

U.S. DEPARTMENT OF JUSTICE
DEC 27 1979
U.S.P.O.

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Manuel Vallecillo
Pueblo International, Inc.
G P O Box 3288
San Juan, Puerto Rico 00936

Dear Mr. Vallecillo:

It has recently come to our attention that your company's check, dated October 2, 1979, payable to the order of Alfredo Ramirez de Arellano in the amount of \$200.00 was subsequently contributed to and expended in connection with the George Bush for President committee. It is our understanding that the funds for such contribution did not represent Mr. Arellano's personal funds but were actually those of your corporation. If this contribution did not represent his personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited. Accordingly, I enclose herewith our check in the amount of \$200.00 to the order of Pueblo International, Inc.

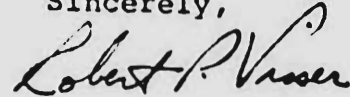
Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you or others in your company would individually like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

91040233139

Mr. Manuel Vallecillo
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

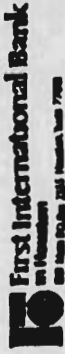
REGISTERED MAIL
RETURN RECEIPT REQUESTED

81040231110

3 1 7 4 0 2 3 3 1 1 1

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024



No 4126

December 19, 1979

GEORGE BUSH 200 000 000
FOR PRESIDENT

DOLLARS \$200.00

PAY

TO THE
ORDER
OF

Pueblo International, Inc.
Attn: Lic. Manuel Vallecillo
G P O Box 3288
San Juan PR 00936

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

⑆00004126⑈ ⑆113000515⑆ 14 4717⑈

CLEARING CHECKS - VV

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$200.00

No 4126

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items listed on this statement. Please retain this statement for your records.

GEORGE BUSH FOR PRESIDENT
712 North Washington Street
Alexandria, Virginia 22314

CLAIM CHECK NO.

264632

DATE

POSTAGE

POSTAGE

POSTAGE

POSTAGE

REGISTERED MAIL
RETURN RECEIPT REQUESTED

REGISTERED
NO. 344216

Miss Maria L. Rojas de Almestica
Calle 206 GV-12
Country Club
Rio Piedras, Puerto Rico 00924

RETURN RECEIPT
REQUESTED

3 4 5 6 7 8 9 10 11 12



SENDER (Complete items 1, 2, and 3. Add your address in the "RETURNS TO" space on reverse)

The following service is requested (check one):

Show to whom and date delivered _____
 Show to whom, date, and address of delivery _____
 RESTRICTED DELIVERY
 Show to whom and date delivered _____
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery _____
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO:

3 ARTICLE DESCRIPTION
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
344210 | | |

(Always obtain signature of addressee or agent)

I have received the article described above:
 SIGNATURE addressee agent

4 DATE OF DELIVERY

5 ADDRESS (Complete only if requested)
 RETURNED TO SENDER

6 UNABLE TO DELIVER BECAUSE UNCLAIMED

CLERK'S INITIALS

From: 66th Infantry Stn. 00029

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL



6679
 11/2/70
 11/2/70

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Miss Maria L. Rojas de Almestica
Calle 206 GV-12
Country Club
Rio Piedras, Puerto Rico 00924

Dear Mis Rojas de Almestica:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

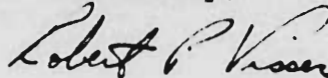
The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Miss Maria L. Rojas de Alместica
December 28, 1979
Page 2

We thank you very much for your interest and support
and would be pleased to answer any further questions you
may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

31710231115

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

GEORGE BUSH FOR PRESIDENT
732 N. WASHINGTON STREET
ALEXANDRIA, VIRGINIA 22314

8 1 0 4 0 2 9 3 1 4 6

80 FEB 4 AM 8:46

Charles N. Steele, Esq,
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

CONFIDENTIAL

CONFIDENTIAL

January 29, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: Pre MUR 50

Please have the attached Pre MUR distributed to the
Commission on an informational basis.

Thank you.

8171023117

12/22/80
AK

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 25, 1980

CONFIDENTIAL

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

Dear Mr. Steele:

Within the recent past a situation has been brought to the attention of the George Bush for President committee ("George Bush for President" or "Committee") involving certain ostensibly individual contributions from citizens of Puerto Rico which in fact have their genesis in corporate funds. Upon receipt of this information, George Bush for President initiated an immediate inquiry into this matter in an attempt to verify and ascertain the status of those contributions. In this connection, and at the behest of both the campaign manager and the treasurer (James A. Baker III, and Thomas M. Roberts, respectively) the undersigned has attempted to trace the source of such contributions and to resolve the matter as quickly as possible.

In the course of that inquiry, I have obtained the following information, while verifying that indeed certain contributions were made to George Bush for President which were actually undisclosed corporate contributions and not those of the individuals whose names accompanied the actual contributions. In view of the facts and circumstances surrounding this matter, and in accordance with the notice to all candidates and committees regarding the treatment of corporate contributions, George Bush for President believes it appropriate that it bring this matter directly and voluntarily to the immediate attention of the Federal Election Commission ("Commission"). Accordingly, I submit herewith the following summary, describing the efforts which George Bush for President has made to ascertain the status of these contributions, and the steps the Committee has taken to promptly rectify the situation.

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I. Procedures to Estop Corporate Contributions

In order to comply with the prohibition in the Federal Election Campaign Act of 1971, as amended, and the Regulations of the Commission promulgated thereunder, regarding the solicitation and/or acceptance of corporate contributions, George Bush for President early instituted several procedures in order to avoid the inadvertent solicitation and/or acceptance of such prohibited contributions.

First, in order to avoid any inadvertent solicitation of corporate contributions, my office has provided legal materials to the Committee's State Finance and Campaign Chairmen relating to the Federal election campaign laws. Certain of this material has been distributed directly by mail upon the appointment of each such state chairman and meetings have been held for the finance chairmen, wherein certain legal materials and information have been distributed. In addition, the State Campaign and Finance chairmen are asked to select a State Legal Counsel to coordinate matters relating, inter alia, to the Federal election campaign laws.

Second, internal processing and accounting control procedures have been developed, within the Houston office of the Committee, to intercept and immediately return any corporate checks which are inadvertently forwarded to the Committee.

Third, with regard to contributions that are received from individuals, the Committee has established certain procedures whereby standard form letters are immediately sent to confirm each contribution both as to the amount and as to the nature of each contribution. In particular, George Bush for President has a so-called "signature letter" (i.e. standard letter No. 9), which is mailed upon receipt of an individual contribution to confirm two statements: (1) The account upon which the check was drawn is not controlled by an incorporated organization; (2) The contribution represents the personal funds of the contributor (Attachment No. 1). This letter is used in all cases such as the instant case, in which the contribution is not received in the form of a personal check but is received in some other form (e.g. a money order).

In sum, George Bush for President has taken all reasonable efforts to devise and implement a system whereby the key people in its fundraising and campaign organization, on a state-by-state basis, are apprised of the fundamental proscriptions in the Act. Moreover, internal controls have been established to identify and return any inadvertent contributions of an unacceptable nature which are forwarded to the Committee.

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II. Puerto Rico - Presidential Primary

The 1980 Presidential primary election for the Republican nomination for President of the United States is the first presidential primary ever held in the Commonwealth of Puerto Rico. As another matter of fact, corporate contributions have been long permissible and commonly solicited in local elections in Puerto Rico. Moreover, as you are probably aware, unlike the situation generally in the United States, political activism and participation in local politics is considerably intense in Puerto Rico. In particular, there currently is a high degree of interest, involvement and passion involved in the issue of Statehood for Puerto Rico and on the interaction of that issue with the Presidential preference primary to take place on February 17, 1980. It is in this general and broad context that we believe the following facts and circumstances must be placed in order to understand the instant situation.

III. Puerto Rico - Fundraising Activities

On or about November 19, 1979, the Houston office of George Bush for President received a November 15 letter, addressed to the campaign chairman, from Mrs. Guilda Julia in Puerto Rico (Attachment No. 2). This letter was obviously sent in response to a standard Committee confirmation letter regarding a contribution of \$1,000 in the name of Mrs. Julia. In that letter Mrs. Julia stated that she "did not personally contribute any amount" but that contributions of \$500 apiece were made by each of the twelve (12) listed corporations which she personally owned or controlled. In addition, she indicated that these corporate checks were made out to "Comite Pro Campana George Bush."

IV. George Bush for President - Corrective Action

Upon receipt of this letter, the situation was immediately brought to the attention of both Messrs. Baker and Roberts, as well as Jeb Bush. Jeb Bush is one of Ambassador Bush's sons and is actively involved in the presidential primary campaign in Puerto Rico. George Bush for President immediately initiated an inquiry into the facts and circumstances surrounding this matter and took the following actions.

First, Messrs. Baker and Roberts called the undersigned and advised of the situation. Second, a review was made of the contributions that had been received from contributors in Puerto Rico to determine whether or not any such indicated corporate checks had in fact been received by the Committee. Third, the campaign's chairman in Puerto Rico, Mrs. Julita Rivera de Vincenti, was immediately contacted for the purposes of reviewing this matter and taking prompt steps to remedy the situation if it were determined that such contri-

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butions had in fact been made by the stated corporations.

The review of the contribution records of George Bush for President did not reveal any such checks made out to "Comite Pro Campana George Bush", nor did it reflect any contributions from the twelve corporations listed in Mrs. Julia's letter. However, upon telephoning Mrs. Vincenti, it was learned that, in fact, certain contributions had been forwarded in the name of named individuals which were actually funds contributed by the named companies, as well as certain other corporations. In view of these statements, and in view of Jeb Bush's fluency in Spanish, he was asked to discuss this matter with Mrs. Vincenti and other campaign personnel to determine the complete factual background surrounding these contributions. Mr. Bush attempted to do this by telephone during the period from November 21 to December 4, 1979. Because of the holiday period and the difficulty in resolving a matter of this nature over long-distance telephone, Mr. Bush went to San Juan, Puerto Rico on December 6th and met the next day with Mrs. Vincenti and the Vice-Chairman of the Puerto Rican campaign, Anthony Rodriguez, to develop the underlying facts.

Mr. Bush prepared a memorandum, dated December 18, 1979, at my request summarizing the facts and information derived through his discussion and meetings with Mrs. Vincenti in Puerto Rico on December 7th. Following this discussion, at which Mr. Bush confirmed that certain corporate contributions had indeed been forwarded to George Bush for President as individual contributions primarily in the form of money orders with accompanying individual contribution cards, George Bush for President immediately attempted to identify the companies which were the sources of such contributions and to return them forthwith. In addition, as it appeared that the campaign chairman of the Puerto Rican Committee had knowledge of such contributions at the time they were forwarded to Houston, but did not apparently understand the nature of her action with regard to such unacceptable contributions, the Committee immediately assigned the Vice-Chairman the role and responsibility of Finance Chairman while the inquiry continued. Moreover, following receipt of further specific information with regard to the corporate funds involved, the Treasurer's office in Houston attempted to make a complete summary analysis and trace of said unacceptable contributions. These worksheets reflect the following information: (a) The disposition and return of the funds which were determined to be corporate funds and the proposed manner of disclosure and reporting on the January 31 FEC Report; (b) Referenced list of individual contributors and the amount and date of contribution subject to the inquiry; (c) copies of said individuals' contribution

cards and money orders; including a personal check from Polly Alemany; (d) Copies of the corporate checks written to the order of "Ciudadanos Pro Democracia"; (e) summary of individuals and companies involved in transactions. Copies of such memoranda and worksheets are attached herewith for your information and convenience (Attachment No. 4a-g).

Following preparation of these worksheets and the accounting analysis made by the Treasurer's office, it was determined that I should personally go to Puerto Rico, along with Jeb Bush, and in some detail again completely review and attempt to document the facts and circumstances surrounding the solicitation and forwarding of such undisclosed corporate contributions. On December 23, 1979, I flew to Puerto Rico to attend a meeting with Mrs. Vincenti and certain other persons listed below. Following is a summary of the information I obtained and the events resulting in these questioned transactions as described to me during the course of that meeting.

The meeting was attended by Mrs. Vincenti; Anthony Rodriguez, Vice-Chairman and Finance Chairman of George Bush for President; Ovidio Rodriguez, Assistant Chairman of the Committee; and Rafael Geigel Vassallo, an attorney with the firm of Chapman, Duff and Paul, in both Puerto Rico and Washington, D.C. Mrs. Vincenti was selected as campaign manager for the Bush campaign in Puerto Rico in January of 1979. In June 1979, Mrs. Vincenti and Mr. Rodriguez travelled to the Houston office of George Bush for President to see the headquarters and discuss the campaign. During that visit they received a copy of the financial "bluebook", which set forth the State accounting and fundraising procedures to be followed by the Committee Finance Chairmen and which was distributed at a meeting of Finance Chairmen held in Houston early in April. No one from Puerto Rico attended that first organizational meeting.

Mrs. Vincenti was apparently chosen as campaign manager because of her extensive involvement in Puerto Rican politics over a long period of time. Mrs. Vincenti has a Ph.D from Cornell in collective bargaining and management, and had taught at the University of Puerto Rico prior to becoming Puerto Rican Secretary of Labor from 1969 through 1972. From 1973 through 1977 she was Director of Human Resources for the Municipal Government of San Juan, and since 1977 has served as a member of the Cabinet and as Administrator of the State Insurance Fund.

During the period from early July through mid-August of 1979, Mrs. Vincenti and Mr. Rodriguez sought to obtain the services of a Finance Director or Chairman to coordinate the fundraising efforts in the Puerto Rican campaign. During that

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period they spoke with three candidates (i.e. Messrs. R. Gonzales, W. Gonzales and Liliana) for Finance Director, but the Committee was turned down on the basis that the people did not have adequate time available to handle such a task. At that time Houston had not as yet provided any budget for the Puerto Rico campaign. Accordingly, a member of the National staff, Fred Bush, suggested that a fundraising event be held in Puerto Rico to provide funds.

It was determined by the Bush Steering Committee in Puerto Rico that a cocktail party should be held on September 6, 1979. Invitations were printed and various individuals were given responsibility for solicitation of individuals to the cocktail party. Most of the solicitation effort was by telephone and other personal contact. No corporation was directly solicited for contributions or the sale of tickets to this function. However, I was advised that several of these individuals believed that, although they could not directly accept corporate contributions, they could sell tickets to such an event to corporate executives and accept corporate checks. Nonetheless, upon the receipt of certain corporate checks by the campaign officials in Puerto Rico, Tony Rodriguez quickly reminded such persons that they could not accept any such corporate contributions and the checks were returned to the corporate officers.

I was again advised at this time that it was very common practice in Puerto Rico to accept corporate contributions with regard to all local political campaigns. Moreover, it apparently has seldom been that advertisements are used for the solicitation of contributions. Instead parties, and other fundraising activities, are most often utilized for the purpose of raising funds for local campaigns. I was further advised that it was usual to set up independent committees for general political purposes, as well as to earmark expenditures for use in a local area and/or for a particular purpose. It was in this manner and in this context that Citizens for a Democracy was established.

In particular, the idea for such a committee was suggested from the floor, at a regular Wednesday meeting of the Bush Steering Committee attended by approximately 30-50 people. Mrs. Vincenti chaired that meeting and thought that the suggestion was a good one and was legally permissible. In view of the common practice in Puerto Rico of forming such independent committees it was presumed to be permissible and no question was raised as to its legality at the meeting. Mr. Rodriguez did not attend that meeting and was apparently not asked for his opinion on the formation of this committee. Neither were Jeb Bush nor the national office of George Bush for President advised of this proposed action.

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I was advised that, although no funds from the newly formed committee and/or bank account were utilized for purposes other than George Bush, if they had had the time and the committee had been in existence for a longer period of time, the funds would have been used to contribute to the National Republican Party and to educate the populace with regard to the procedures to be followed regarding the advent of the first Puerto Rican presidential primary.

The details regarding the setting up of the committee account are set forth in Jeb Bush's memorandum of December 18, 1979. In sum, an account in the name of "Ciudadanos Pro Democracia" (i.e. "Citizens for Democracy") was opened on October 11th at the Banco de Ponce (Account No. 29-073590-5). As indicated in the copy of the bank deposit book, an initial deposit of \$1,500 was made on that date, and an additional deposit of \$400 was made on October 26, 1979. Moreover, the \$6,000 in contributions in the amount of \$500 each by twelve corporations owned or controlled by Mrs. Julia was made to the order of the committee and not George Bush for President. However, the checks were not actually deposited in said account. On the contrary, apparently the \$6,000 in checks were cashed at the Banco de Ponce and money orders or bank checks in various amounts were issued by the bank. The \$1,900 in funds actually deposited in said accounts were received from the following corporations in the amounts respectively set forth next to their name:

1. Coamo Fashions, Inc.	\$200.00
2. Ehret, Inc.	200.00
3. Hospital Supply Co.	100.00
4. Pueblo International, Inc.	200.00
5. Puerto Rico Oil, Inc.	200.00
6. United Sales Electronic & Service, Inc.	200.00

The additional two corporate contributions of \$400 each to said account in the aggregate amount of \$800 were provided by the following two corporations on the dates set forth next to their name:

1. Oliver Realty, Inc. Box 1178 Arcibo, Puerto Rico 00612	October 5, 1979
2. Colmado Truman, Inc. Provisiones Yucoros Avenida Borsa Haito Rey, Puerto Rico	October 8, 1979

The independent committee account at the Banco de Ponce was established by Polly Alemany and Rafael Fuentes, both of whom

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are assistants to Mrs. Vincenti at the State Insurance Fund. It is my understanding that the contributions which were solicited for this committee account were made by the same individuals who originally received the unacceptable corporate contributions. It is also my understanding that the contributors indicated that they were making the contribution to this Committee for use by George Bush and in any other manner the Committee might desire to utilize said monies, including promotion of Statehood and the National Republican Party.

The distribution of \$7,900 was traced by Mr. Bush and myself as follows:

1. \$6,500 was forwarded to George Bush for President in Houston by money orders and a personal check from Polly Alemany in the names of sixteen (16) individuals. Contribution cards were filled in by Mrs. Vincenti and others representing such contributions as individual contributions. Mrs. Vincenti indicated that she personally spoke with all of the individuals involved whoses names were used on the contribution cards and that all such individuals indicated their willingness to have there names utilized for this purpose. It was Mrs. Vincenti's misunderstandings that monies from such an independent committee could be utilized in this manner, and that such individual contributions could be accepted by the Committee.

2. Certain expenses totalling \$447.98 were paid from funds from the account. This included expenditures of \$300 for stamps, \$100 for soft drinks, and \$47.98 for food. The stamps were utilized in a mailing to potential delegates. Additional cash totalling \$152.02 was given to Jeb Bush. (This was subsequently converted into a money order and returned to one of the corporations, as described below.) The balance of \$800 was the closing balance of the account and was taken by Mrs. Vincenti to return to Oliver Realty, Inc. and Calmado Truman, Inc.

At the end of our interview, Mrs. Vincenti stated that she had not realized that the formation of such a committee, and the acceptance of corporate contributions for such general political purposes, would be in violation of the Federal election campaign laws. She expressed great dismay and disappointment that she or the committee had done anything which in any way might prove embarassing to Ambassador Bush. She explained, in general, that from the time of the planning of the cocktail party through December she and other members of the campaign had been personally involved with an extraordinary array of major political events occuring in Puerto Rico. In particular, she noted that, in September, they were active with the Governor's birthday party, a fundraiser for the Mayor, and a fund-

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raiser for the Speaker of the House. In November, they were involved with a new Progressive Party function and a kick-off for Mayor Padilla. And finally, in December, they were caught us with the holidays and coordination and preparation of a Caravan for George Bush throughout Puerto Rico which occurred at the end of December. At the close of the meeting Mrs. Vincenti indicated she would do whatever was necessary to clear up this matter with the campaign and the Commission.

In addition to the above-mentioned corporate contributions, Mrs. Vincenti was asked to review the list of contributors from Puerto Rico which I provided from the Houston office (Attachment No. 5). She was able to determine that three additional individual contributions, in the aggregate amount of \$400, was actually provided by three corporations. She identified the individual contributors and the companies as follows:

1. Francisco Carvajal	Olympic Mills	\$100.00
2. Francisco M. Carrera	F.&J.M. Carrera, Inc.	200.00
3. S. Luna	Luna Paint	100.00

A review of the contribution information listed on our computer print-out sheets indicated that the address of the individuals listed in these instances were the same as that of the company of which each of the respective gentlemen were President and/or Chief Executive Officer.

V. George Bush for President - Return of Unacceptable Contributions.

Upon my return from Puerto Rico, I reviewed the situation with the campaign officials and we took the following further action to remedy the situation.

First, letters were written to each of the individual contributors involved advising them that we had received information that their contribution was not an individual contribution but that of a corporation (Attachment No. 6). Second, we wrote letters, enclosing appropriate checks, to each of the corporations identified by Mrs. Guilda Julia, returning the \$400 contributions made by them with explanatory letters (Attachment No. 7). Third, we returned the remaining monies to the other identified corporations in the amounts Mrs. Vincenti said had been received by them, along with a money order returning the cash which was carried by Mr. Bush to Houston and which has not been used for out-of-pocket expenses in connection with campaign activities (Attachment No. 8). Fourth, with regard to the three additional companies whose names I did not at first have on my return, a special escrow account was set up in the amount of \$400 to handle the return of that money.

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These funds were similarly refunded along with an appropriate accompanying letter on January 14, 1980. Fifth, the contribution of Polly Alemany in the amount of \$500, which was received by personal check by George Bush for President, was held in abeyance until it could be determined whether or not that was actually paid for by corporate funds, and if so to whom the money should be returned. Letters have been drafted to return such contributions upon receipt of such checks by this office from Houston. Sixth, Mrs. Vincenti resigned as Chairwoman of the Puerto Rican campaign committee and that resignation was accepted by the campaign (Attachment No. 9 a and b).

On January 22, 1980, it was learned that Polly Alemany's contribution of \$500 was actually funds given by the following five corporations of \$100 apiece:

1. A.P.S. International Corporation
2. Bella International Corporation
3. Casa Elmendorf, Inc.
4. Gomez Hermanos, Inc.
5. Luvi Trucking, Inc.

Following all of the above steps, we determined that, in view of the unusual facts and circumstances surrounding this matter, the result of our inquiry should be set forth in the instant memorandum and brought promptly to the attention of the General Counsel's office of the Commission. I believe the Committee has taken every step possible to conduct a prompt and thorough inquiry regarding these unacceptable contributions and has fully satisfied its responsibility under the Federal election campaign laws and regulations.

In addition, following my interview with Mrs. Vincenti, it appears that the formation of this independent Committee for Democracy was the result of a large public Steering Committee meeting which was following procedures typically followed in Puerto Rico elections during a time of intense local and national political activity. There was no finance chairman in charge of such solicitation effort, although active attempts had been made to obtain a finance chairman who would have been directly advised of the applicable Federal election campaign laws and regulations and the procedures mandated by the Committee. In view of the critical fact that this is Puerto Rico's first presidential primary election, and the extraordinarily intense political activism involved in the Commonwealth of Puerto Rico, it appears that the confusion engendered by the activities of this independent committee has been quickly controlled and rectified. Mrs. Vincenti has been fully cooperative with the Committee's efforts to resolve this matter and has expressed her complete willingness to discuss this matter with any representative of the Federal Election Commission, either in

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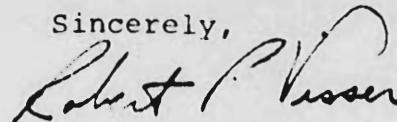
Charles N. Stee, Esq.
January 25, 1980
Page 11

CONFIDENTIAL

Washington or in Puerto Rico.

George Bush for President will, of course, be pleased to review this matter with you if you so desire and to answer any further questions you may have.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III
Thomas M. Roberts
Mrs. Julia Rivera de Vincenti
Rafael Geigel Vassallo, Esq.

3104023113

GEORGE BUSH
710 NORTH POST OAK ROAD
SUITE 208
HOUSTON, TEXAS 77024

(713) 467-1980

MEMO
FROM: JEB BUSH
DATE: 12-18-79
RE: PUERTO RICO FUNDRAISING

On November 19, the Houston office received a letter addressed to Jim Baker from Gilda Julia. This letter was in response to a letter sent by our Treasurer's department requesting a confirmation of .. \$1000 contribution believed to be made by Mrs. Julia.

Mrs. Julia stated that she did not give the campaign a \$1000 personal contribution, but that 12 corporations in which she owned a majority of the stock made \$500.00 contributions to the George Bush for President campaign. This was the first time that I or any other member of the national campaign staff was aware of this occurrence.

One or two days after receiving the letter, I discussed the matter with Jim Baker and Bob Visser. It was decided that we should contact Julia Rivera to determine what was going on and to take steps to remedy the situation.

In my discussions, during the period of November 21 to December 4, I learned that corporate money was received to buy tickets for the September 12 fundraiser in San Juan. On a previous occasion (I believe in September) I had told her that the campaign could not receive corporate contributions. Mrs. Rivera returned the corporate checks and told the people to give checks in the name of Ciudadanos-Pro Democracia which opened a bank account with Polly Aleman and Rafael Fuentes authorized to sign. These corporate funds were then used to buy cashier's checks in the names of individuals to the order of the George Bush for President. I told Mrs. Rivera to close the account (she did so on December 4) and to give me the names of all people who gave money to the campaign which was not their own funds. Because of the Thanksgiving holidays and because of the problems in getting a matter of this nature completely resolved over the phone, I decided to go to San Juan on December 6. During this period I also discussed the matter with Tony Rodriguez, our Vice Chairman, to see if he could get information.

On December 7, I met with Mrs. Rivera to discuss political matters and the fundraising problem. At this meeting, the following was learned:

The account in the name of Ciudadanos Pro-Democracia was opened on October 11 at Banco de Ponce and assigned #29-073590-5. An initial deposit was made of \$1500 and on 10-26-79, an additional deposit of \$400 was made. Thus, including the corporate contributions totalling \$6000 from Mrs. Julia, \$7900 of corporate contributions were made to Ciudadanos Pro-Democracia.

ATTACHMENT No. 3

317033159

Memo on Puerto Rican fundraising
December 18, 1979

CORPORATE CONTRIBUTIONS TO CIUDADANOS PRO-DEMOCRACIA

Checks of \$500 each from 12 corporations owned by Mrs. Julia	\$6000.00
Pueblo International, Inc.*	200.00
United Sales Electronic & Service Inc.	200.00
Coamo Fashions, Inc.	200.00
Fhret, Inc.	200.00
The Hospital Supply Company (Casa Llompart)	100.00
Puerto Pico Oil Co.	200.00
	<hr/>
	\$7100.00
2 corporate contributions (names not known) who were to be refunded their money from cash withdrawn from account when it was closed.	800.00
	<hr/>
	\$7900.00

*This check was to the order of Alfredo Ramirez de Arellano, who endorsed it over to the Ciudadanos Pro-Democracia

The \$7900 was accounted for as follows:

1. \$6500 appears to have been sent to the George Bush for President campaign by money orders and in personal checks in the name of 16 individuals. Cards were filled in by Mrs. Rivera to comply with the FEC matching fund requirements.
2. Expenses totalling \$447.98 were paid from funds from the account. These were \$300 for stamps, \$100 for soft drinks and \$47.98 for food.
3. Cash totalling \$152.02 was given to me to take to Houston.
4. As mentioned above, \$800.00, which was the closing balance of the account was to be returned to two corporations who gave money to Ciudadanos Pro-Democracia.

I advised Mrs. Rivera that we had assigned Tony Rodriguez the job of Finance Chairman and that she should concentrate on political activities. This was done verbally and informally.

On my return to Houston, I provided the above information to our Treasurer's office (December 19, in afternoon, to be exact).

Attached are the documents we have regarding this situation.

B I O : 3 : 1 : 5 0

Memo on Puerto Rican fundraising
December 18, 1979
page 3

It is my belief that Mrs. Rivera did not understand the legal implications of her actions. I say this based on my knowledge of her as a person and based on the fact that political activity in Puerto Rico is very different than the mainland. For example, corporations can give money to political campaigns there.

8 1 0 1 0 2 3 3 1 5 1

Mr. Isidoro Roffe
Mamuel Coamo Fashions, Inc.
 QUISQUEYA 171, HATO REY, P. R. 00917
 TEL. (809) 793-8700

101-277
215

No. 02423

FECHA 10-8- 19 79

PAY THE SUM 200 DOLLARS \$ 200.00

TO THE ORDER OF

CIUDADANOS PRO DEMOCRACIA

Isidoro Roffe
 COAMO FASHIONS, INC.
Isidoro Roffe

BANK OF AMERICA

⑆0215⑆0277⑆6275⑆10031⑆01⑆8⑆

312103113

President & General Manager

EHRET INC.

07793

FUNERAL DIRECTORS
 G.P.O. BOX 6045

SAN JUAN, PUERTO RICO 00936
 TEL. 763-1030

101-203
215

THE CHASE MANHATTAN BANK, N. A.
 HATO REY BRANCH
 HATO REY, PUERTO RICO

October 8, 19 79

PAY THE SUM 200 DOLLARS DOLLARS \$ 200.00

TO THE ORDER OF

CIUDADANOS PRO DEMOCRACIA

EHRET INC.

Isidoro Roffe
Isidoro Roffe

⑆0215⑆0206⑆707⑆10047⑆12⑆



Mamuel Llompart
THE HOSPITAL SUPPLY COMPANY
 (CASA LLOMPART)

101-202
215

No. 02995

G.P.O. BOX 1516, SAN JUAN, PUERTO RICO 00736
 TELS. 764-2450, 764-8015

DATE OCTOBER 8, 19 79

PAY THE SUM 100 DOLLARS DOLLARS \$ 100.00

TO THE ORDER OF:

CIUDADANOS-PRO DEMOCRACIA

Mamuel Llompart
 THE HOSPITAL SUPPLY COMPANY
 PRESIDENT
Isidoro Roffe
 TREASURER

THE ROYAL BANK OF CANADA
 SAN JUAN BRANCH
 SAN JUAN, PUERTO RICO

⑆0215⑆0202⑆865⑆1383900⑆

Comite Pro Democracia

CUENTA No 29-073590-5

FECHA	RETIROS	DEPOSITOS	INTERSES	BALANCE	TRANS.
11-79		**1,500.00		**1,500.00	AD
12-79		2**400.00		**1,900.00	CH
1-79		***600.00			RD
1-1-79	**800.00			**1,100.00	MAVA
1-9-79	**300.00			***800.00	MAVA
4-79	ERROR	ERRATA	***00.00	**1,600.00	CM
4-79	<u>**800.00</u>			*****.00	MB

CTA
CERRADA

CTA
CERRADA

BANCO DE PONCE

3 1 0 3 8 1 0 1 0 1 0

TEL 724-2929

JOHN NAPOLI & ASSOC., INC.

"FOOD SERVICE EQUIPMENT CONSULTANTS AND SUPPLIERS"

308 Ponce De Leon Ave
P.O. Box 5125 Puerto Terra P.R.
San Juan, P.R. 00918

PERMIT FOR RETURNED MERCHANDISE NOT TO EXCEED
30 DAYS AND MUST HAVE OUR WRITTEN PERMISSION.

Cash

NO CASH REFUND ON CLOSED
RETURNED GOODS. CREDIT FOR
FUTURE PURCHASE OR 20%
RESTOCKING CHARGE.

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1 ea	Teakwood Grill		
1 ea	Teakwood Grill		3.55
6 ea	Cup	30	1.80
5 ea	Plunger	1.00	5.00
5 ea	4	1.20	6.00
			<u>\$16.35</u>

*Due amount
in Cash*

RECEIVED
PAYMENT

TERMS: MERCHANDISE NOT RETURNABLE WITHOUT THIS SLIP TOTAL

0007913

THANK YOU FOR THIS ORDER WE LOOK FORWARD TO SERVING YOU AGAIN

RECEIVED THE ABOVE IN GOOD CONDITION

BY _____

POSTAL SERVICE
CASH RECEIPT

DATE

\$150.⁰⁰



100 Dollars,

(Signature and title)

PS Form 1096
Jan. 1974

U.S. Government Printing Office: 1979-651-212

San Juan, Puerto Rico
December 7, 1979

I certify that I spent \$150 purchasing one thousand
(1,000) 15¢ postage stamps for mailing congratulatory
letters to the delegates elected to the National
Puerto Rican Convention.

Julia Rae Vincenti
Julia Rivera de Vincenti
Campaign Manager

3101033155

San Juan, Puerto Rico
December 7, 1979

I certify that I spent \$100 for 20 cases of Coca-Cola
used in the hospitality room, Holiday Inn Hotel, during
the Republican Convention, November 11, 1979.

Julia Leo Vincenti
Julia Rivera de Vincenti
Campaign Manager

310103157

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0001.69 45
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7 139 10 117 9

10-07
Luis Caparra

FUNDRAISING PROBLEM.

1. PR ród \$ 7900 (copies of checks enclosed) in corporate checks to the order of Ciudadanos Pro Democracia. An organization incorrectly set up with Polly Aleman and RAFAEL FUENTES as signors on account.
2. Cashiers checks were issued from account and also not from account in name of individuals to G.B for Pres.
3. Expenses worth \$ 600 (min cash) were paid from account
4. ~~cash of \$ 800 was left over from account~~
People we need to omit.

✓ Polly Aleman	\$ 500	✓ 10-16-79-10	
✓ Millie Rodriguez T.	250	10-31-79-3	50,000.00 +
✓ Alberto Thiller	250	10-31-79-3	25,000.00 +
Pedro Acevedo Torres	250	10-31-79-3	25,000.00 +
✓ Violan Paradis	250	10-31-79-3	25,000.00 +
✓ Marc Rojas de Alameida	250	10-31-79-3	25,000.00 +
✓ John Ramirez de Arrella	250	10-31-79-3	50,000.00 +
✓ Rafael Fuentes	250	10-31-79-3	25,000.00 +
✓ Penjiro Rivera Rodriguez	500	10-31-79-3 250.00 10-31-79-3-250.00	25,000.00 +
✓ Madga Colli	250	10-31-79-3	50,000.00 +
✓ Ovidio Rodriguez Torres	500	10-31-79-3 250.00 10-31-79-3 250.00	25,000.00 +
✓ Ruth Rodriguez de Acevedo	250	10-31-79-4	100,000.00 +
✓ Gore Vincenti	500	10-31-79-4 250.00 10-31-79-4 250.00	100,000.00 +

✓	Alida Lopez Ramirez	250	10-31-79-3
✓	Raul Slabin	1000	10-31-79-3
✓	Gilda Julia	1000	90-31-79-4
		<u>6500</u>	\$6500

Expenses.

1000 stamps	\$150 ✓
1000 stamps	\$150 ✓
purchase of Cotes - Conant	\$100 ✓
Food - Conant	47.98 ✓
Cash	152.00 → 152.00
	<u>600.00</u>

600 -
<u>7100</u>

Action

1. Letter to each corporate check
2. Advice of individuals?
3. CASIO?
4. EXPENSES?
5. Tony Rodriguez fundraising chairman

✓-Receipts

Lic. Manuel Vallecillo

PUEBLO INTERNATIONAL, INC.

CFO BOX 3288
SAN JUAN, P. R. 00936

101-208
215

NO. 04879

BANCO CREDITO & AHORRO PONCEÑO
CALLE STAMAR, PUERTO RICO

DREBS	DISCOUNT	DATE	AMOUNT OF PAY
\$200.00		10-2-79	\$200.00

PAY TO THE ORDER OF:

ELIEZER RAMIREZ DE ARELLANO
P.O. BOX 5028
SAN JUAN, PUERTO RICO 00936



Eliezer Ramirez
San Juan, P.R.

⑆0215⑆0206⑆ 032⑆000769⑆

Eliezer Martinez

UNITED SALES ELECTRONIC & SERVICE, INC.

1698

TEL. 753-5255
P.O. BOX 11209, CAPARRA HEIGHTS STA.
276 CESAR GONZÁLEZ ST.
HATO REY, P.R. 00910

101-205
215

Oct. 10 1979

THIS CHECK IS DELIVERED IN FULL TO THE FOLLOWING ACCOUNT (S)

AMOUNT
<i>Declarativo</i>

PAY TO THE ORDER OF *Ciudadanos Pro Democracia* \$ *200.00*
DOSCIENTOS DOLLARS

THE CHASE MANHATTAN BANK
National Association
Bayamón Branch, Bayamón, Puerto Rico

Eliezer Martinez

⑆021502066⑆ 705⑆00076722⑆

Departamento Comité Pro Democracia

Received indirectly \$7100.00 From 18 Puerto Rican corporations.

We are refunding the 7100.00 as follows:

6500.00 * Received and deposited as individual contributions. See list of 16 names and amounts (\$6500.00 total). These will be listed as individual contributions on the 12-31-79 FEC report, Sch. A-P. These will also be "footnoted" as refunds; listed on the 12-31-79 Sch B-P, Line 27a as 16 checks going to Puerto Rican corporations totaling \$6500.00.

Send letter of explanation w/ these 16 checks.

Describe refunds on Sch B-P, Line 27c, as "Return of unacceptable contribution"

* Our records show \$6,000.00 in cashier's checks on 10-31-79. As of 12/19/79, I don't know where or from whom the \$500.00 came.

447.98
~~464.33~~

An "in-kind contribution" of campaign-related expenses; see receipts attached.

Remaining 3 checks, to remaining 3 corporations will be listed as campaign operating (Puerto Rico cost center) expenses on Line 24a, Sch B-P.

152.02 Converted to a money order and refunded to remaining corporation, along with the check of 47.98 in step 2. (totaling \$200.00)

Attachment No. 2/a

List of individual contributors:

Cashiers check #

- ? ① * Ms. Polly Alemany (500.00 - personal check 10-16-79-1 OK)
 ? no record of a 500.00 cashiers check on 10-31-79 from Polly Alemany. Have we received the 500? And from who?
- ✓ ② * Miss Millie Rodriguez 250.00 10-31-79-3 0989353
 (Torre)
- ✓ ③ * Mr. Gilberto S. Thillet 250.00 10-31-79-3 0989348
- ✓ ④ * Mr. Pedro J. Acevedo Torres 250.00 10-31-79-3 0989350
- ✓ ⑤ * Mrs. Violeta Paradis 250.00 10-31-79-3 0989346
- ✓ ⑥ * Ms. Maria R. de Almestica 250.00 10-31-79-3 0989354
- ✓ ⑦ * Mr. John R. de Arellano 250.00 10-31-79-3 0989352
- ✓ ⑧ * Mr. Rafael Fuentes 250.00 10-31-79-3 0989351
- ✓ ⑨ * Mr. Denjiro Rivera (Rodriguez) 250.00 10-31-79-3 & 250.00 10-31-79-3
 0989341 0989344
- ✓ ⑩ * Mrs. Magda Colli 250.00 10-31-79-3 0989345



BANCO DE PONCE
PONCE, PUERTO RICO

107-208 215
No. 0989353

14 Oct. 4 19 79

PAY 29 BANCO DE PONCE - 250 DOLS 00 CTS
NOTE VALID OVER \$250.00

TO THE ORDER OF

GEORGE BUSH FOR PRESIDENT

Millie Rodriguez Torres
SIGNATURE

Calle Tamarindo 1206
ADDRESS

0989353 021502095 00000116 Highland Park, Rio Piedras, P. R. 00924

Millie Rodriguez Torres

George Bush for President

P. O. Box 1980, Houston, Texas 77024

10 31 79 - 3

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Miss Millie Rodriguez Torres "millie"

Home Address Calle Tamarindo 1206, Highland Park

City Rio Piedras State P. R. Zip 00924

Telephone Number _____

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

Title of Occupation Deputy Director - Computers Division

Name of company (or self-employed) State Insurance Fund

City / State San Juan, P. R.

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

Paid for by George Bush for President



BANCO DE PONCE
PONCE, PUERTO RICO

10 31 79 - 3 107-208 215

No. 0989348

25 Oct. 4 19 79

PAY 29 BANCO DE PONCE - 250 DOLS 00 CTS
NOTE VALID OVER \$250.00

TO THE ORDER OF

GEORGE BUSH FOR PRESIDENT

Gilberto S. Thillet
SIGNATURE

Calle 44 - F-7, Colinas de

Montecarlo, Rio Piedras,

0989348 021502095 00000116 P. R. 00924

Gilberto S. Thillet

George Bush for President

P. O. Box 1980, Houston, Texas 77024

10 31 79 - 3

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Gilberto S. Thillet "Gilberto"

Home Address Calle 44 - F-7, Colinas de Montecarlo

City Rio Piedras State P. R. Zip 00924

Telephone Number 762-3301

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

Title of Occupation College Professor

Name of company (or self-employed) State Insurance Fund

City / State San Juan, P. R.

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

GC



BANCO DE PONCE

10 3179 - 3101-209
215

PONCE, PUERTO RICO

17. Oct. 4 19 79

No. 0989350

PAY

29 BANCO DE PONCE - 250 DOLS 00 CTS

NOT VALID OVER \$250.00

TO THE ORDER OF

GEORGE BUSH FOR PRESIDENT

Pedro J. Acevedo Torres
SIGNATURE

Calle 42 - E-37, Colinas

de Montecarlo, Río Piedras

P. R. 00924

Pedro Acevedo Torres

①0989350① ①021502095① 00①000116①

George Bush for President

P. O. Box 1980, Houston, Texas 77024

10 3179 - 3

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Pedro J. Acevedo Torres "Pedro"

Home Address Calle 42 - E-37, Colinas de Montecarlo

City Río Piedras State P. R. Zip 00924

Telephone Number 762-7440

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

Title of Occupation Lawyer Director Claims Dept.

Name of company (or self-employed) State Insurance Fund

City / State San Juan, Puerto Rico

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

Paid for by George Bush for President

553A

10 3179 - 3



BANCO DE PONCE

10 3179 - 3101-209
215

PONCE, PUERTO RICO

16. Oct. 4 19 79

No. 0989346

PAY

29 BANCO DE PONCE - 250 DOLS 00 CTS

NOT VALID OVER \$250.00

TO THE ORDER OF

GEORGE BUSH FOR PRESIDENT

Violeta Paradis
SIGNATURE

1510 Barracuda St.

Bahía Vistamar, Carolina,

P. R.

Violeta Paradis

①0989346① ①021502095① 00①000116①

George Bush for President

P. O. Box 1980, Houston, Texas 77024

10 3179 - 3

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Mrs. Violeta Paradis "Mrs. Paradis"

Home Address 1510 Barracuda Street, Bahía Vistamar

City Carolina State P. R. Zip 00630

Telephone Number 768-4276

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

Title of Occupation Undersecretary Dept. of Consumers Affairs

Name of company (or self-employed) Government of Puerto Rico

City / State San Juan, P. R.

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

553A



BANCO DE PONCE

PONCE, PUERTO RICO

10 24 77 101-208 215

No. 0989354

Sept. 20 19 79

PAY

29 BANCO DE PONCE 250 DOL. 00 CTS

NOT VALID OVER \$250.00

TO THE ORDER OF

BUSH FOR PRESIDENT

Maria L. Rojas de Almestica

Calle 206 GV-12

Country Club, Rio Piedras,

0989354 021502095 00000116 P. R. 00924

MARIA L. ROJAS DE ALMESTICA

George Bush for President

P. O. Box 1980, Houston, Texas 77024

10 31 79 - 3

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Marfa L. Rojas de Almestica Maria

Home Address Calle 206 GV-12 Country Club

City Rio Piedras State P. R. Zip 00924

Telephone Number 769-7778

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

Title of Occupation Executive : Secretary

Name of company (or self-employed) State Insurance Fund

City / State San Juan, Puerto Rico

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

Paid for by George Bush for President



BANCO DE PONCE

PONCE, PUERTO RICO

10 31 79 - 3 101-208 215

No. 0989352

Oct. 4 19 79

PAY

29 BANCO DE PONCE 250 DOL. 00 CTS

NOT VALID OVER \$250.00

TO THE ORDER OF

GEORGE BUSH FOR PRESIDENT

John Ramirez de Arellano

Cleveland E. Street

Parkville, Guaynabo, P. R.

0989352 021502095 00000116 John Ramirez de Arellano

George Bush for President

P. O. Box 1980, Houston, Texas 77024

10 31 79 - 3

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name John T. Ramirez de Arellano John

Home Address Cleveland E, St., Parkville

City Guaynabo State P. R. Zip 00657

Telephone Number

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

Title of Occupation RBA - Special Aide to Administrator

Name of company (or self-employed) State Insurance Fund

City / State San Juan, Puerto Rico

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

PAY 29 BANCO DE PONCE 250 DOLS 00 CTS
 NOT VALID OVER \$250.00

TO THE ORDER OF GEORGE BUSH FOR PRESIDENT

Rafael Fuentes
 Cond. Garden Hills Plza I - DdY, Guaynabo
Rafael Fuentes

①0989351① ①021502095① 00①000116①

George Bush for President 10 31 79 - 3 (8)
 P. O. Box 1980, Houston, Texas 77024

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Rafael Fuentes
 Home Address Cond. Garden Hills Plza I - Apt. 204 COND. Garden Hills Plaza
 City Guaynabo Guaynabo State P.R. P.R. Zip 00927 I
 Telephone Number 783-6303 Apt. # 504

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:
 Title of Occupation Administrative Aide, Industrial Aide
 Name of company (or self-employed) State Insurance, P.R.
 City / State Guaynabo, P.R.

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.
 Paid for by George Bush for President

553A

PAY 29 BANCO DE PONCE 250 DOLS 00 CTS
 NOT VALID OVER \$250.00

TO THE ORDER OF BUSH FOR PRESIDENT

Denjiro Rivera Rodriguez
 762 Lopez Sicard6 Ave.,
 Rio Piedras, P.R. 00923

①0989341① ①021502095① 00①000116①

Denjiro Rivera Rodriguez

George Bush for President 10 31 79 - 3 (9)
 P. O. Box 1980, Houston, Texas 77024

Here is my contribution to "George Bush for President" in the amount of \$ 250.

Name Mr. Denjiro Rivera Rodriguez
 Home Address 762 Lopez Sicard6
 City Rio Piedras State P.R. Zip 00923
 Telephone Number _____

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:
 Title of Occupation Mechanical Engineer
 Name of company (or self-employed) P.R. Industrial Development
 City / State Nuevo Rey, Puerto Rico

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.
 Paid for by George Bush for President



BANCO DE PONCE

10 31 79 - 3 101-209 215

PONCE, PUERTO RICO

No. 0989344

23. Sept. 20. 19 79

PAY

29 BANCO DE PONCE - 250 DOLS 00 CTS

10 31 79 - 3

NOT VALID OVER \$250.00

TO THE ORDER OF

BUSH FOR PRESIDENT

Denjiro Rivera Rodriguez
SIGNATURE

762 López Sicardó Ave. Río

Piedras, P. R. 00923

⑈0989344⑈ ⑆021502095⑆ 00⑈000116⑈

Denjiro R. Rodriguez

George Bush for President

P. O. Box 1980, Houston, Texas 77024-250.

10 31 79 - 3

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Mr. Denjiro Rivera Rodriguez

Home Address 762 López Sicardó

City Río Piedras State P. R. Zip 00923

Telephone Number 751-8710

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

Title of Occupation Mechanical Engineer

Name of company (or self-employed) P. R. Industrial Development Co.

City / State Hato Rey, Puerto Rico

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

Paid for by George Bush for President

10 31 79 - 3



BANCO DE PONCE

10 31 79 - 3 101-209 215

PONCE, PUERTO RICO

No. 0989345

22. Oct. 2. 19 79

PAY

29 BANCO DE PONCE - 250 DOLS 00 CTS

NOT VALID OVER \$250.00

TO THE ORDER OF

GEORGE BUSH FOR PRESIDENT

Magda Colli
SIGNATURE

San Jorge 363, Apt. 5

Santurce, P. R. 00912

⑈0989345⑈ ⑆021502095⑆ 00⑈000116⑈

Magda Colli

George Bush for President

P. O. Box 1980, Houston, Texas 77024

10 31 79 - 3

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Mrs. Magda Colli *Mrs. Colli*

Home Address 363 San Jorge St., Apt. 5

City Santurce State P. R. Zip 00912

Telephone Number 727-2090

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

Title of Occupation Adm. Officer Dean Services

Name of company (or self-employed) University of Puerto Rico

City / State Río Piedras, Puerto Rico



BANCO DE PONCE

PONCE, PUERTO RICO

101-209
215

No. 0989342

20 Sept. 20 19 79

103179-3

PAY

29 BANCO DE PONCE 250 DOLS 00 CTS

NOT VALID OVER \$250.00

TO THE
ORDER
OF

BUSH FOR PRESIDENT

Ovidio Rodriguez Torres
SIGNATURE

G.P. O. Box 5028, San Juan,

P. R. 00936

⑆0989342⑆ ⑆021502095⑆ 00⑆000116⑆ Ovidio Rodriguez Torres

George Bush for President

P. O. Box 1980, Houston, Texas 77024

103179-3

68FP
off. filed
11

Here is my contribution to "George Bush for President" in the amount of \$ 250.

Name Ovidio Rodriguez Torres "OVIDIO"

Home Address Calle 5 N-29 Santa Monica

City Bayamón State P.R. Zip 00619

Telephone Number _____

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

9 Title of Occupation CPA Economist

Name of company (or self-employed) State Inv. Co.

City / State San Juan

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

553A

Paid for by George Bush for President



BANCO DE PONCE

PONCE, PUERTO RICO

101-209
215

No. 0989343

21 Sept. 20 19 79

103179-3

PAY

29 BANCO DE PONCE 250 DOLS 00 CTS

NOT VALID OVER \$250.00

TO THE
ORDER
OF

BUSH FOR PRESIDENT

Ovidio Rodriguez Torres
SIGNATURE

G.P. O. Box 5028, San Juan,

P. R. 00936

⑆0989343⑆ ⑆021502095⑆ 00⑆000116⑆ Ovidio Rodriguez Torres

George Bush for President

P. O. Box 1980, Houston, Texas 77024

103179-3

68FP
off. filed
11

Here is my contribution to "George Bush for President" in the amount of \$ 250.

Name Ovidio Rodriguez Torres "OVIDIO"

Home Address Calle 5 N-29 Santa Monica

City Bayamón State P.R. Zip 00619

Telephone Number _____

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

Title of Occupation CPA

9 Name of company (or self-employed) State Inv. Fund

City / State San Juan P.R.

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

553A

Paid for by George Bush for President

(4)



BANCO DE PONCE

101-209
215

No. 0389349

PONCE, PUERTO RICO

Oct. 4

29 BANCO DE PONCE - 250 DOLLS 00 CTS 1979

103179 4

PAY

NOT VALID OVER \$250.00

TO THE
ORDER
OF

GEORGE BUSH FOR PRESIDENT

Ruth L. Rodriguez de Acevedo
SIGNATURE

Calle 42 - E-37, Colinas de
Montecarlo, Río Piedras,

①0989349① ①021502095① 00①000115① P. R. 00924

Ruth L. Rodriguez de Acevedo

(4)

George Bush for President

103179 4

(12)

P. O. Box 1980, Houston, Texas 77024

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Ruth L. Rodríguez de Acevedo

Home Address Calle 42 E-37, Colinas de Montecarlo

City Río Piedras State P. R. Zip 00924

Telephone Number 762-7440

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

(17) Title of Occupation Planner - Chief Investign Dept.

Name of company (or self-employed) State Insurance Fund

City / State San Juan, P. R.

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

553A

Paid for by George Bush for President



BANCO DE PONCE

101-209
215

No. 0389355

PONCE, PUERTO RICO

Sept. 20 19 79

3.0

29 BANCO DE PONCE - 250 DOLLS 00 CTS

PAY

NOT VALID OVER \$250.00

TO THE
ORDER
OF

BUSH FOR PRESIDENT

José A. Vincenti
SIGNATURE

762 López Sicardó Ave.

Río Piedras, P. R. 00923

①0989355① ①021502095① 00①000115①

George Bush for President

(13)

103179 4

P. O. Box 1980, Houston, Texas 77024

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Mr. José A. Vincenti

Home Address 762 López Sicardó Ave.,

City Río Piedras State P. R. Zip 00923

Telephone Number 751-8710

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

(11) Title of Occupation Businessman

Name of company (or self-employed) Retired

City / State Río Piedras, Puerto Rico

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20453.

55319

Paid for by George Bush for President



BANCO DE PONCE

PONCE, PUERTO RICO

101-209
215

20. Sept. 20 19 79

No. 098935

PAY

29 BANCO DE PONCE - 250 DOLS 00 CTS

NOT VALID OVER \$250.00

TO THE ORDER OF

BUSH FOR PRESIDENT

José A. Vincenti
SIGNATURE

762 López Sicardó Ave.,
ADDRESS

Río Piedras, P.R. 00923

⑈0989355⑈ ⑆021502095⑆ 00⑈000116⑈

George Bush for President

P. O. Box 1980, Houston, Texas 77024

103179 4

Here is my contribution to "George Bush for President" in the amount of \$ 250

Name Mr. José A. Vincenti

Home Address 762 López Sicardó Ave.

City Río Piedras State P.R. Zip 00923

Telephone Number _____

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

① Title of Occupation Businessman

Name of company (or self-employed) Retired

City / State _____

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

553A

Paid for by George Bush for President



BANCO DE PONCE

PONCE, PUERTO RICO

101-209
215

16. Oct. 4 19 79

No. 098934

PAY

29 BANCO DE PONCE - 250 DOLS 00 CTS

NOT VALID OVER \$250.00

TO THE ORDER OF

GEORGE BUSH FOR PRESIDENT

Alida L. Ramirez
SIGNATURE

Cond. Belén - Apt. 1206

Ave. San Patricio, Guaynabo,

P. R. 00654
Alida L. Ramirez
RAMIREZ

⑈0989347⑈ ⑆021502095⑆ 00⑈000116⑈

George Bush for President

P. O. Box 1980, Houston, Texas 77024

103179-3

Here is my contribution to "George Bush for President" in the amount of \$ 250.00

Name Alida López Ramirez *Alida*

Home Address Cond. Belén - Apt. 1206, Ave. San Patricio

City Guaynabo State P. R. Zip 00654

Telephone Number 792-5882

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

40 Title of Occupation Director Administrative Services

Name of company (or self-employed) State Insurance Fund

City / State San Juan, P. R.

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

553A

Paid for by George Bush for President

MANAGER'S CHECK

BANCO DE PONCE

1060676

PONCE, PUERTO RICO 00731

PAY THE AMOUNT OF *****\$1000.00***

10-18-79

DOLLARS CTS

*****\$1000.00**



TO THE ORDER OF

11.

103179-3

*****BUSH FOR PRESIDENT*****

Raúl Slabin
AUTHORIZED SIGNATURE
29

⑆1060676⑆ ⑆0215⑆0209⑆ 00⑆000108⑆

George Bush for President

P. O. Box 1980, Houston, Texas 77024

103179-3

Here is my contribution to "George Bush for President" in the amount of 1,000.00

Name Raúl Slabin (Raúl)
Home Address Box 11605
City Santurce State P. R. Zip 00910
Telephone Number 788-1192

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

32 Title of Occupation Real Estate Broker
Name of company (or self-employed) Self-employed
City / State San Juan, P. R.

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, DC 20463.

Paid for by George Bush for President

S53A

MANAGER'S CHECK

BANCO DE PONCE

1060677

PONCE, PUERTO RICO 00731

PAY THE AMOUNT OF *****\$1000.00**

10-18-79

DOLLARS CTS

*****\$1000.00**



TO THE ORDER OF

5. (103179 4)

*****BUSH FOR PRESIDENT*****

Gilda Julia
AUTHORIZED SIGNATURE
29

⑆1060677⑆ ⑆0215⑆0209⑆ 00⑆000108⑆

Sent letter # 9 10/31/79

George Bush for President

P. O. Box 1980, Houston, Texas 77024

103179 4

Here is my contribution to "George Bush for President" in the amount of \$ 1,000.00

Name Mrs. Gilda Julia "Gilda"
Home Address Box 11605
City Santurce State P. R. Zip 00910
Telephone Number 788-1192

Please make checks payable to "George Bush for President". Federal law limits contributions to \$1,000 per person. No corporate contributions or cash donations, please.

Federal law requires us to ask for the following information:

32 Title of Occupation Real Estate Broker
Name of company (or self-employed) Self-employed
City / State San Juan, P. R.

A copy of our report is on file with the Federal Election Commission and available for purchase from the Federal Election Commission

NO RECEIPT (16)

ALMAC ENTERPRISES, INC.
P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

Refund check
copies attached

101-234
215

DATE

Visser
50,000.+
50,000.+
50,000.+
50,000.+
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50,000.+
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50,000.+
50,000.+
10,000.+
20,000.+
20,000.+
650,000.+

12 to
Gilda
Julia

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA

THE SUM 500.00 DOLLARS

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

ALMAC ENTE

12/19/79
ck # 4130

⑆0215⑆0204⑆0484563⑆

x 3

CITY ENTERPRISES, INC.
P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-234
215

015 items

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

THE SUM 500.00 DOLLARS

DOLLARS

CITY ENTERPRISES, INC.

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

12/19/79
ck # 4129

⑆0215⑆0204⑆0478946⑆

LEASING & BROKERAGE, INC.
APARTADO 11605 SANTURCE 00910

520 101 204
215

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

September 6, 1979

THE AMOUNT OF THE ORDER OF THE SUM 500.00 DOLLARS \$ 500.00**

CIUDADANO PRO DEMOCRACIA

Leasing & Brokerage, Inc.

12/19/79
ck # 4135

⑆0215⑆0204⑆0240680⑆

PUERTO NUEVO DISTRIBUTION CENTER, INC.
P.O. BOX 11605
SANTURCE, PUERTO RICO 00910

No 2225

101-234
215

September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

THE SUM 500.00 DOLLARS

DOLLARS

CITIBANK

PUERTO NUEVO DISTRIBUTION CENTER, INC.

12/19/79
ck # 4138

⑆0215⑆0204⑆0484563⑆

2/D

917013135

POLLY RODRIGUEZ ALEMANY 461
 CALLE AMAZONAS 136 - URB. EL PARAISO
 RIO PIEDRAS, P.R. 00926

10/11/77

PAY TO THE ORDER OF *Bush for President* \$ 500.00
quinientos DOLLARS

BANCO DE PONCE
 SU CASAL EL SEÑORIAL
 EL SEÑORIAL PLAZA
 R.O. PIEDRAS, PUERTO RICO

FOR *Polly R. Alemany*

⑆026502095⑆ ⑆100604857⑆

167910

GIRAFÁ, INC. 0 1 0 1 3 1 1
P. O. BOX 1605
SANTURCE, PUERTO RICO 00910

101-224
215

Nº 553

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

THE 500 DOLLARS

DOLLARS

GIRAFÁ, INC

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

12/19/79
ck # 4132

⑆0215⑉0204⑆ 0478938⑈

[Signature]

SAN JUAN REALTY CORP.

P. O. BOX 11605
SANTURCE, P.R. 00910

Nº 168

101-202
215

September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

THE 500 DOLLARS

DOLLARS



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

12/19/79
ck # 4127

⑆0215⑉0202⑆ 859⑈1737614⑈

[Signature]

INDUSTRIAL WAREHOUSE INC.

P. O. BOX 11605
SANTURCE, PUERTO RICO

101-204
215

Nº 990

DATE September 6, 1979

PAY TO THE ORDER OF

THE 500 DOLLARS

DOLLARS \$ 500.00**

CIUDADANO PRO DEMOCRACIA

INDUSTRIAL WAREHOUSES INC.

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

12/19/79
ck # 4128

⑆0215⑉0204⑆ 0246775⑈

[Signature]

CASTLE ENTERPRISES, INC.

P. O. BOX 11605
SANTURCE, P.R. 00910

Nº 123

101-202
215

September 6, 1979

PAY TO THE ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

THE 500 DOLLARS

DOLLARS



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

12/19/79
ck # 4131

⑆0215⑉0202⑆ 859⑈1115767⑈

[Signature]

101-204
215

September 6, 19 79

PAY TO THE
ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

THE SUM OF FIVE HUNDRED DOLLARS

DOLLARS

CITIBANK

Citibank, N.A.

Hato Rey, P.R. 00918

12/19/79
ck # 4136

⑆0215⑆0204⑆ 0492088⑆

Anthony Quiñones
Gilda Julia

PUERTO NUEVO DEVELOPMENT CORP.
APARTADO 11605 SANTURCE 00910

101-204
215

2488

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

September 6, 19 79

PAY THE AMOUNT OF
TO THE ORDER OF

THE SUM OF FIVE HUNDRED DOLLARS

\$ 500.00**

CIUDADANO PRO DEMOCRACIA

PUERTO NUEVO DEVELOPMENT CORP.

Anthony Quiñones
AUTHORIZED SIGNATURE
Gilda Julia
AUTHORIZED SIGNATURE

12/19/79
ck # 4137

⑆0215⑆0204⑆ 0478237⑆

TRIPLE A INVESTMENTS, INC.
P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-204
215

No 2

DATE September 6, 1979

PAY
TO THE ORDER OF

THE SUM OF FIVE HUNDRED DOLLARS

DOLLARS \$ 500.00**

CIUDADANO PRO DEMOCRACIA

TRIPLE A INVESTMENTS, INC.

Anthony Quiñones
Gilda Julia

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

12/19/79
ck # 4134

⑆0215⑆0204⑆ 0239645⑆

SILVER, INC.
P.O. BOX 11605
SANTURCE, P.R. 00910

101-204
215

CHECK NO

\$ 500.00

SILVER, INC.

PAY TO THE ORDER OF

CIUDADANO PRO DEMOCRACIA

12/19/79
ck # 4133

⑆0215⑆0204⑆ 0212125⑆

Anthony Quiñones

3 1 0 1 0 : 3 3 3



Manuel Llopart
**THE HOSPITAL SUPPLY COMPANY
(CASA LLOPART)**

G.P.O. BOX 1516, SAN JUAN, PUERTO RICO 00936
TELS. 764-2450, 764-6615

101-202
215

No. 02995

DATE OCTOBER 8, 19 79

THE SUM 100 DOLLARS DOLLARS, \$ 100.00

TO THE ORDER OF:

CIUDADANOS-PRO DEMOCRACIA

THE HOSPITAL SUPPLY COMPANY

Manuel Llopart
PRESIDENT
[Signature]
TREASURER

THE ROYAL BANK OF CANADA
SAN JUAN BRANCH
SAN JUAN, PUERTO RICO

12/19/79

⑆0215⑆0202⑆ 865⑆1383900⑆

ck# 4124

Eliezer Martinez

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT (S)	
	AMOUNT
<i>Manatya</i>	

UNITED SALES ELECTRONIC & SERVICE, INC.

TEL. 753-8255
P.O. BOX 11209, CAPARRA HEIGHTS STA.
278 CESAR GONZÁLEZ ST.
HATO REY, P.R. 00919

1698

101-208
215

Oct-10 19 79

PAY TO THE ORDER OF Ciudadanos Pro Democracia \$ 200.00

DOSCIENTOS 00 DOLLARS

THE CHASE MANHATTAN BANK
National Association
Bayamón Branch, Bayamón, Puerto Rico

Eliezer Martinez

ck# 4125
12/19/79

⑆021502066⑆ 705⑆076722⑆

Lic. Manuel Vallecillo

PUEBLO INTERNATIONAL, INC.

GPO BOX 3268
SAN JUAN, P. R. 00936

101-208
215

NO. 04879

FRANCISCO S. ANTONIO PONCEÑO
SAN JUAN, PUERTO RICO

TO THE ORDER OF:

DEBIT	CREDIT	DATE	AMOUNT
	\$200.00	10-2-79	\$200.00

FREDO RAMIREZ DE ARELLANO
P.O. BOX 5028
SAN JUAN, PUERTO RICO 00936

ck# 4126
12/19/79

⑆0215⑆0208⑆ 032⑆000769⑆



[Signature]

These are the steps: 1. 30 Refunds 1. 1. 3. 3
Reimbursement of expenses (447.98) and money order (152.0)

3 Refund check copies attached

Kindly contribute



Attn: President CAMPAIGN OPER. EXPENSE
Puerto Rico Oil Co. Inc. 101-201
G. P. O. BOX 3267—SAN JUAN, P. R. 00936 PETROLEUM PRODUCTS 215

BANCO POPULAR CENTER BRANCH
SAN JUAN, PUERTO RICO

DATE Agosto 31, 1979 No. 1663

PAY

*** 200 DOLLARS 00¢ \$ 200.00

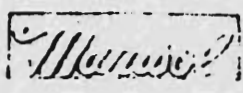
CIUDADANOS PRO-DEMOCRACIA

PUERTO RICO OIL CO., INC.

AUTHORIZED SIGNATURE

ck # 4123

⑆0215⑆0201⑆ 30⑆02852⑆3⑆



Mr. Isidoro Roffe
Cosmo Fashions, Inc.
QUISQUEYA 171, HATO REY, P. R. 00917
TEL. (809) 753-8700



101-277
215

No. 02423

FECHA 10-8- 19 79

PAY

THE SUM 200 DOLLARS \$ 200.00

TO THE ORDER OF

CIUDADANOS PRO DEMOCRACIA

COSMO FASHIONS, INC.

money order of 152.02
ck # 4721 of 47.98

BANK OF AMERICA

200.00 ⑆0215⑆0277⑆6275⑆10031⑆01⑆8⑆

President & General Mgr.
EHRET INC.
FUNERAL DIRECTORS
G.P.O. BOX 6045
SAN JUAN, PUERTO RICO 00936
TEL. 763-1030

07793

101-203
215

THE CHASE MANHATTAN BANK, N. A.
HATO REY BRANCH
HATO REY, PUERTO RICO

October 8, 19 79

PAY

THE SUM 200 DOLLARS \$ 200.00

CIUDADANOS PRO DEMOCRACIA

EHRET INC.

ck # 4122

⑆0215⑆0206⑆ 707⑆1⑆001⑆7⑆2⑆

2E

3 1 0 4 0 ?
GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
 PH. 713-GOP-1980
 710 NORTH POST OAK, NO. 205
 HOUSTON, TEXAS 77024

First International Bank
 in Houston
 80 Main PO Box 2335 Houston, Texas 77002

Visser
 No 4122

December 19, 1979

GEORGE BUSH FOR PRESIDENT 200 000 00 CTS DOLLARS \$200.00

Ehret Inc.
 Attn: President and General Manager
 G. P. O. Box 6045
 San Juan PR 00936

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

[Signature]

⑈00004122⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79		\$200.00

No 4122

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
 PH. 713-GOP-1980
 710 NORTH POST OAK, NO. 205
 HOUSTON, TEXAS 77024

First International Bank
 in Houston
 80 Main PO Box 2335 Houston, Texas 77002

No 4123

December 19, 1979

GEORGE BUSH FOR PRESIDENT 200 000 00 CTS DOLLARS \$200.00

Puerto Rico Oil Co., Inc.
 Attn: Mr. President
 G. P. O. Box 3267
 San Juan PR 00936

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

[Signature]

⑈00004123⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79		\$200.00

No 4123

2/E

DETACH AND RETAIN THIS STATEMENT

3 1 0 4 0 2 3 3 1 2

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

 **First International Bank**
in Houston
602 Main PO Box 2555 Houston, Texas 77002

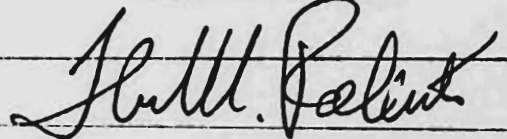
No 4121

December 19, 1979

PAY TO THE ORDER OF **GEORGE BUSH FOR PRESIDENT** 47 101598 CTS DOLLARS \$47.98

Coamo Fashions, Inc.
Attn: Mr. Isidoro Roffe
Quisqueya 171
Hato Rey, PR 00917

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT



⑈00004121⑈ Ⓞ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
------	-------------	--------

AMERICAN EXPRESS MONEY ORDER **Dec 18 79** 23-1 1020

04-977,822,512

POST OAK BANK **15202 CTS**

PAY THE SUM OF
NOT GOOD OVER \$1,000.

DATE 12/18/ 79

TO THE ORDER OF **Coamo Fashions, Inc**

SENDER'S NAME AND ADDRESS
PAYABLE THRU FIRST NATIONAL BANK
DENVER, COLORADO

BEFORE CASHING READ NOTICE ON BACK

CHAIRMAN

⑆ 10 20 ⑈ 000 1:04 ⑈ 9778 225 122 ⑈

04-977,822,512

AMERICAN EXPRESS COMPANY
DENVER, COLORADO 80220
PURCHASER'S RECEIPT - FILL IN KEEP FOR YOUR RECORD
AMOUNT _____ DATE _____
SENT TO _____
FOR SEE AGREEMENT ON OTHER SIDE
FORM NO. 5207
AMERICAN EXPRESS COMPANY ISSUER

3-1 0 4 0 2 3 1 0 2

A. Individuals - December 28, 1979:

1. de Acevedo, Ruth L. Rodriguez (Miss)
2. de Almestica, Maria L. Rojas (Miss)
3. de Arellano, John T. Ramirez
4. Colli, Magda (Mrs.)
5. Fuentes, Rafael
6. Julia, Guilda (Mrs.)
7. Paradis, Violeta (Mrs.)
8. Ramirez, Alida Lopez (Miss)
9. Rodriguez, Denjiro Rivera
10. Slabin, Raul
11. Thillet, Gilberto S.
12. Torres, Millie Rodriguez (Miss)
13. Torres, Ovidio Rodriguez
14. Torres, Pedro Acevedo
15. Vincenti, Jose A.

B. Companies - December 28, 1979:

1. Mrs. Guilda Julia
 - a. Almac Enterprises, Inc.
 - b. Castle Enterprises, Inc.
 - c. City Enterprises, Inc.
 - d. Girafa, Inc.
 - e. Gateway Plaza, Inc.
 - f. Industrial Warehouses, Inc.
 - g. Leasing & Brokerage, Inc.
 - h. Puerto Nuevo Distribution Center, Inc.
 - i. San Juan Realty Corporation
 - j. Silver, Inc.
 - k. Triple A Investment, Inc.
2. Companies
 - a. Coamo Fashions, Inc.
 - b. Ehret, Inc.
 - c. Hospital Supply Company
 - d. Pueblo International, Inc.
 - e. Puerto Rico Oil Co., Inc.
 - f. United Sales Electronic & Service, Inc.

C. Individuals - January 14, 1980:

1. Carrera, Francisco M.
2. Caravajal, Francisco
3. Luna, S. (Mr.)

- MORE -

26

D. Polly Alemany

1. APS International Corporation
2. Bella International Corporation
3. Casa Elmendorf, Inc.
4. Gomez Hermanos, Inc.
5. Luvi Trucking, Inc.

3 1 7 1 0 3 1 2 1 2
GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
101 Houston
103 Main PO Box 7555 Houston, Texas 77002

Visser
No 4126

December 19, 1979

GEORGE BUSH FOR PRESIDENT 200 00 00 CTS DOLLARS \$200.00

Pueblo International, Inc.
Attn: Lic. Manuel Vallecillo
G P O Box 3288
San Juan PR 00936

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

⑈00004126⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$200.00

No 4126

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
101 Houston
103 Main PO Box 7555 Houston, Texas 77002

No 4127

December 19, 1979

PAY TO THE ORDER OF GEORGE BUSH FOR PRESIDENT 500 00 00 CTS DOLLARS \$500.00

San Juan Realty Corporation
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

⑈00004127⑈ ⑆113000515⑆ 14 4717⑈

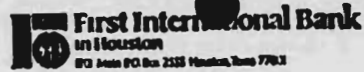
GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

4.8
No 4127

DETACH AND RETAIN THIS STATEMENT

GEORGE BUSH FOR PRESIDENT
 OPERATING ACCOUNT
 PH. 713-GOP-1980
 710 NORTH POST OAK, NO. 205
 HOUSTON, TEXAS 77024



No 4125

December 19, 1979

GEORGE BUSH FOR PRESIDENT **200** NO. **500** CTS DOLLARS \$ 200.00

United Sales Electronic & Service Inc.
 Attn: Eliezar Martinex
 G P O Box 11209
 Hato Rey, PR 00919

GEORGE BUSH FOR PRESIDENT
 OPERATING ACCOUNT

Hull Roberts

⑈00004125⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$200.00

No 4125

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT
 OPERATING ACCOUNT
 PH. 713-GOP-1980
 710 NORTH POST OAK, NO. 205
 HOUSTON, TEXAS 77024



No 4124

December 19, 1979

GEORGE BUSH FOR PRESIDENT **100** NO. **500** CTS DOLLARS \$ 100.00

Hospital Supply Company
 Attn: Manuel L. Lompart
 G P O Box 1516
 San Juan PR 00936

GEORGE BUSH FOR PRESIDENT
 OPERATING ACCOUNT

Hull Roberts

⑈00004124⑈ ⑆113000515⑆ 14 4717⑈


GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$100.00

No 4124

1 0 1 0 2 3 1 2 5

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
PH. 713-GDP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

 **First International Bank**
170 Houston
603 Main P.O. Box 2325 Houston, Texas 77008

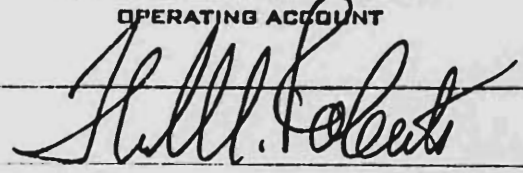
No 4133

December 19, 1979

GEORGE BUSH FOR PRESIDENT **500** AND **500** CTS DOLLARS \$ 500.00

Silver, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT



⑈00004133⑈

⑆113000515⑆

14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

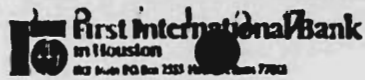
DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4133

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

8 1 0 1 0
GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
 PH. 713-GOP-1980
 710 NORTH POST OAK, NO. 205
 HOUSTON, TEXAS 77024



No 4137

December 19, 1979

PAY TO THE ORDER OF **GEORGE BUSH FOR PRESIDENT** **500** AND **00** CTS DOLLARS \$ **500.00**

Puerto Nuevo Distribution Center, Inc.
 Attn: Gilda Julia
 G. P. O Box 11605
 Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

[Signature]

⑈00004137⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00
		No 4137

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
 PH. 713-GOP-1980
 710 NORTH POST OAK, NO. 205
 HOUSTON, TEXAS 77024



No 4138

December 19, 1979

PAY TO THE ORDER OF **GEORGE BUSH FOR PRESIDENT** **500** AND **00** CTS DOLLARS \$ **500.00**

Puerto Nuevo Development Corp.
 Attn: Gilda Julia
 P. O. Box 11605
 Santurce, PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

[Signature]

⑈00004138⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00
		No 4138

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

 First International Bank
in Houston
819 Main PO Box 2533 Houston, Texas 77001

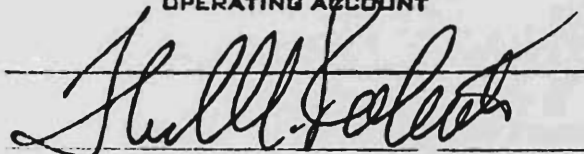
No 4135

December 19, 1979

PAY TO THE ORDER OF GEORGE BUSH FOR PRESIDENT 500.00 DOLLARS \$ 500.00

Leasing & Brokerage, Inc.
Attn: Gilda Julia
GPO Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT



⑆00004135⑆

⑆113000515⑆

14 4717⑆

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00


No 4135

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

 First International Bank
in Houston
819 Main PO Box 2533 Houston, Texas 77001

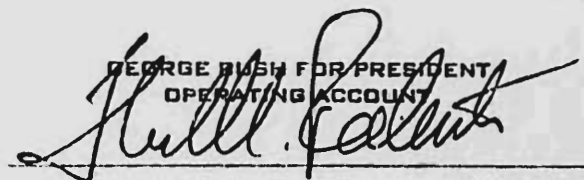
No 4136

December 19, 1979

PAY TO THE ORDER OF GEORGE BUSH FOR PRESIDENT 500.00 DOLLARS \$ 500.00

Gateway Plaza, Inc.
Attn: Gilda Julia
G.P.O. Box 11605
Santurce, PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT



⑆00004136⑆

⑆113000515⑆

14 4717⑆

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4136

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

 First International Bank
in Houston
803 Main PO Box 2555 Houston, Texas 77002

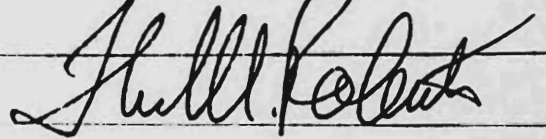
No 4132

December 19, 1979

GEORGE BUSH FOR PRESIDENT 500 DOLLARS \$500.00

Girafa, Inc.
Attn: Gilda Julia
GPO Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT



⑈00004132⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4132

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

 First International Bank
in Houston
803 Main PO Box 2555 Houston, Texas 77002

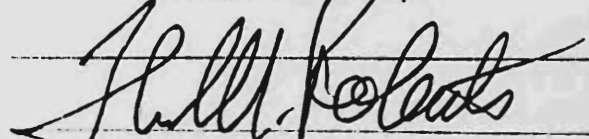
No 4134

December 19, 1979

GEORGE BUSH FOR PRESIDENT 500 DOLLARS \$500.00

Triple A Investment, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT



⑈00004134⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4134

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024



No 4130

December 19, 1979

GEORGE BUSH FOR PRESIDENT 500 AND 00 CTS DOLLARS \$ 500.00

Almac Enterprises, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

⑈00004130⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4130

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1930
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024



No 4131

December 19, 1979

GEORGE BUSH FOR PRESIDENT 500 AND 00 CTS DOLLARS \$500.00

Castle Enterprises, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

⑈00004131⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4131

3 1 7 1 7
GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
in Houston
800 Main P.O. Box 2533 Houston, Texas 77008

No 4128

December 19, 1979

GEORGE BUSH FOR PRESIDENT 500 NO 500 CTS DOLLARS \$ 500.00

Industrial Warehouses, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

Hull Roberts

⑈00004128⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4128

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
in Houston
800 Main P.O. Box 2533 Houston, Texas 77008

No 4129

December 19, 1979

GEORGE BUSH FOR PRESIDENT 500 NO 500 CTS DOLLARS \$ 500.00

City Enterprises, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

Hull Roberts

⑈00004129⑈ ⑆113000515⑆ 14 4717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4129

DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of items described above. If not correct please notify us promptly.

**George Bush
for President.**

710 North Post Oak Road, Houston
Texas 77024 (713)467-1980

Dear

Thank you so very much for your generous contribution to George Bush for President. Mr. Bush is extremely grateful for your support.

The Federal Election Commission requires that we have the signature of each contributor as well as the contributor's confirmation of the following statements:

- 1) The account upon which the check was drawn is not controlled by an incorporated organization.
- 2) The contribution represents the personal funds of the contributor.

Please sign your name in the space provided if the above information is correct. Once again, thank you for your help.

Sincerely,

Pat Halla
Treasurer's Office

I made a contribution in the amount of _____ to George Bush for President and the above statements 1) and 2) are correct.

(Signature of contributor)

(Date)

Handed letter # 9 -- "signature" letter.

ATTACHMENT No. 1

NOV 19 1979

GILDA JULIÁ
P. O. Box 11605
SANTURCE, P. R. 00910

November 15, 1979

Mr. James A. Baker, III, Chairman
George Bush for President
710 North Post Oak Road
Suite 208
Houston, Texas 77024

Dear Mr. Baker:

I am returning your letter requesting confirmation of contributions to George Bush for President because:

1. I did not personally contribute any amount
2. Contributions of \$500.00 each were made by the following Corporations, of which I personally own a majority of the stock, or all the stock
 - a. San Juan Realty Corporation
 - b. Industrial Warehouses, Inc.
 - c. City Enterprises, Inc.
 - d. Almac Enterprises, Inc.
 - e. Castle Enterprises, Inc.
 - f. Girafa, Inc.
 - g. Silver, Inc.
 - h. Triple A Investment, Inc.
 - i. Leasing & Brokerage, Inc.
 - j. Gateway Plaza, Inc.
 - k. Puerto Nuevo Distribution Center, Inc.

Attachment No. 2

31710131003

Mr. James A. Baker, III

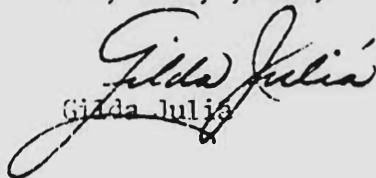
- 2 -

November 15, 1979

1. Puerto Nuevo Development Corporation

3. All checks were made out to: "Comité Pro Campaña George Bush"

Very truly yours,


Gilda Julia

aet

Enclosure

8100131204

SILVER, INC.

P.O. BOX 11605
SANTURCE, P.R. 00910

3 1 7 1 0 2 3 1 2 0 5

101 204
215

CHECK NO.

DATE
9-06-79

DOLLARS AND CENTS
EXACTLY \$500.00/100**

\$ 500.00**

PAY TO THE ORDER OF
CIUDADANO PRO. DEMOCRACIA

SILVER, INC.

[Handwritten Signature]

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

FIRST NATIONAL CITY BANK
HATO REY, P.R.

⑆0215⑆⑆0204⑆ 0476269⑆

ALMAC ENTERPRISES, INC.

P. O. BOX 11605

SANTURCE, PUERTO RICO 00911

204
15 001642

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

500.00 DOLLARS

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

ALMAC ENTERPRISES, INC.

⑆0215⑉0204⑆ 0484563⑈

CITY ENTERPRISES, INC.

P. O. BOX 11605

SANTURCE, PUERTO RICO 00910

101-204
215

NO 223

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

500.00 DOLLARS

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

CITY ENTERPRISES, INC.

⑆0215⑉0204⑆ 0478746⑈

LEASING & BROKERAGE, INC.

APARTADO 11605 SANTURCE 00910

52

FIRST NATIONAL CITY BANK
Hato Rey Branch, Santurce, Puerto Rico

September 6, 1979

PAY THE AMOUNT OF TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

CIUDADANO PRO DEMOCRACIA

Leasing & Brokerage, Inc.

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

⑆0215⑉0204⑆ 0240680⑈

GATEWAY PLAZA, INC.

P.O. BOX 11605
SANTURCE, P.R. 00910

No 1501

101-204
215

September 6, 1979

PAY TO THE
ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

500 000000

CITIBANK

Citibank, N.A.

Hato Rey, P.R. 00918

Ronald Young
Glenn Julia

⑆0215⑉0204⑆ 0492088⑈

PUERTO NUEVO DEVELOPMENT CORP.

APARTADO 11605 SANTURCE 00910

2488

FIRST NATIONAL CITY BANK

Hato Rey Branch, Santurce, Puerto Rico

September 6, 1979

PAY THE AMOUNT OF
TO THE ORDER OF

500 000000

\$ 500.00**

CIUDADANO PRO DEMOCRACIA

PUERTO NUEVO DEVELOPMENT CORP

Ronald Young
AUTHORIZED SIGNATURE
Glenn Julia
AUTHORIZED SIGNATURE

⑆0215⑉0204⑆ 0478237⑈

TRIPLE A INVESTMENTS, INC.

P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-204
215 No

DATE September 6, 1979

PAY
TO THE ORDER OF

500 000000

DOLLARS \$ 500.00**

CIUDADANO PRO DEMOCRACIA

TRIPLE A INVESTMENTS, INC.

Ronald Young
Glenn Julia

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO

⑆0215⑉0204⑆ 023965⑈

3 1 2 7 0 2 3 1 1 3

PUERTO NUEVO DISTRIBUTION CENTER, INC.
P.O. BOX 11605
SANTURCE, PUERTO RICO 00910

No 2225

101-204
215

September 6, 19 79


PAY TO THE
ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

Five Hundred 00/100 DOLLARS 00 CTS

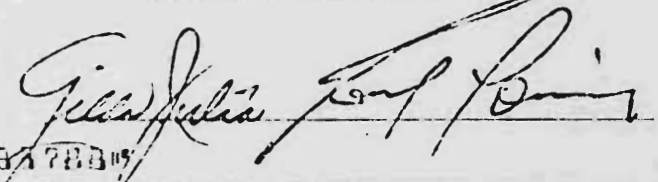
DOLLARS

CITIBANK 

Citibank, N.A.

Hato Rey, P. R. 00918

PUERTO NUEVO DISTRIBUTION CENTER, INC.



⑆021502040⑆ 048788⑈

AUTHORIZED SIGNATURE

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

⑆021502040⑆ 0476269⑈

CASTLE ENTERPRISES, INC.

P. O. BOX 11605
SANTURCE, P.R. 00910

No 123

101-202
215

September 6, 19 79

PAY TO THE
ORDER OF

CIUDADANO PRO DEMOCRACIA

\$ 500.00**

FIVE HUNDRED DOLLARS



THE ROYAL BANK OF CANADA
HATO REY BRANCH
FUERTO RICO

[Handwritten signature]

⑆0215⑆0202⑆ 859⑆145767⑆

AUTHORIZED

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO

⑆0215⑆0204⑆ 0476269⑆

GIRAFÁ, INC.
P. O. BOX 11605
SANTURCE, PUERTO RICO 00910

101-204
215

NO 550

DATE September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

79 309500 DOLS 00 CTS

GIRAFÁ, INC.

FIRST NATIONAL CITY BANK
HATO REY, PUERTO RICO



⑆0215⑉0204⑆ 0478938⑈

SAN JUAN REALTY CORP.

P. O. BOX 11605
SANTURCE, P. R. 00910

NO 168

101-204
215

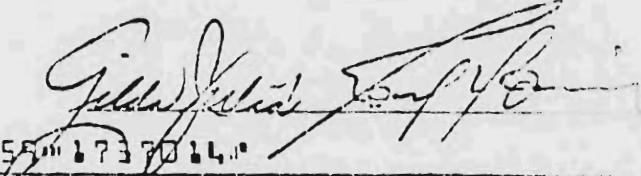
September 6, 1979

PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA \$ 500.00**

79 309500 DOLS 00 CTS



THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO



⑆0215⑉0202⑆ 855⑈1737014⑈

INDUSTRIAL WAREHOUSE INC.

P. O. BOX 11605
SANTURCE, PUERTO RICO

101-204
215

NO 169

DATE September 6, 1979

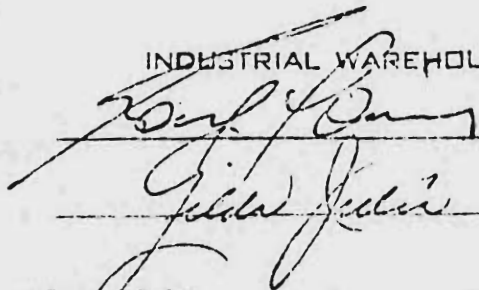
PAY TO THE ORDER OF CIUDADANO PRO DEMOCRACIA DOLLARS \$ 500.00**

79 309500 DOLS 00 CTS

CIUDADANO PRO DEMOCRACIA

INDUSTRIAL WAREHOUSES INC.

FIRST NATIONAL CITY BANK
SANTURCE, PUERTO RICO



⑆0215⑉0201⑆ 0241775⑈

SAN JUAN PUERTO RICO
OCCUPATION STATE GOVERNMENT

IDENTIFICATION NUMBER	PERSONAL INFORMATION	OCCUPATION	START DATE	ANNUAL AMOUNT	YEAR TOTAL
00922CLAS490J1 783-4955	MR. JACQUIN CLAS CALLE SIBIO 450 ALTAMIRA RIO PIEDRAS, PR 00922		013 11/21/75	15.00	15.00
00922CL55786J1	MR. JACQUIN CLASS CAPARRA HEIGHTS P O BOX 10766 SAN JUAN, PR 00922	SAN JUAN MUNICIPAL GOVT SAN JUAN, PR OCCUPATION FACTORY WORKER	009 10/16/79	15.00	15.00
00917CLL2000C4	MRS. CARMEN R. COLLAZO CALLE PEJICO COND TORRE DE CRC APT 702 HATCO REY, PR 00917	OCCUPATION HOME MAKER	003 10/17/79	120.00	120.00
00912CLL1363M6 727-2090 (10)	MRS. MAGDA CELLI MRS CELLI 363 SAN JORGE ST APT 5 SANTURCE, PR 00912	UNIVERSITY OF PUERTO RICO RIO PIEDRAS, PR OCCUPATION EDUCATION	003 10/31/79	\$250.00	\$250.00
00912CLL1363M0	MS. MAGDA F. CELLI 363 SAN JORGE ST APT 5 SANTURCE, PR 00912	UNIVERSITY OF P R RIO PIEDRAS PUERTO RICO, PR OCCUPATION OFFICE WORKER	006 09/29/75	125.00	125.00
00928CNDE94211	MR. ISIDRO CONDE MR. CONDE CALLE UGALDE 1942 BORINQUEN GO RIO PIEDRAS, PR 00928	SOCIAL SECURITY ADM RIO PIEDRAS PUERTO RICO, PR OCCUPATION U. S. GOVERNMENT	004 05/28/75	150.00	150.00
00928CIT0019J1	MR. JOSE A. COYTC RR 19 M 5 BO TERRUGG BUZON 161 RIO PIEDRAS, PR 00928	URBAN RENEWAL ADM RIO PIEDRAS, PR OCCUPATION SERVICE REP	007 10/18/75	110.00	110.00
00926DY15009A	MS. ALMA DAVIS CALLE S F M 26 URB CUPEY GARDN RIO PIEDRAS, PR 00926	STATE INSURANCE FUND RIO PIEDRAS, PR OCCUPATION LAWYER	007 10/18/75	15.00	15.00
009240CVD042R0 762-7440 (12)	MS. RUTH L. R. DE ACEVEDO RUTH CALLE 62 E-37 COL DE MONTECARL RIO PIEDRAS, PR 00924	STATE INSURANCE FUND SAN JUAN, PR OCCUPATION INSURANCE	004 10/31/79	\$250.00	\$250.00
00924DLM5206M0 769-7778 (6)	MS. MARIA L. R. DE ALMESTICA MARIA CALLE 206 GV-12 COUNTRY CLUB RIO PIEDRAS, PR 00924	STATE INSURANCE FUND SAN JUAN, PR OCCUPATION STATE GOVERNMENT	003 10/31/79	\$250.00	\$250.00

11
SILVERADO ST. HANVILLE
MAYAGUEZ, PR. 00857

REVENUE STATE GOVERNMENT

009250CFH000P1	MRS. PATRIA F. DE CIFREDO UNIVERSIDAD DE P. R. CONSEJO SUPERIOR DE ENSEÑANZA RIO PIEDRAS, PR. 00925		009 10/16/79	\$50.00	YEAR TOTAL	150.00
009270GZM007G4	MRS. GLORIA F. DE GUZMAN CALLE 7 #1044 VILLA NEVAREZ RIO PIEDR. PR. 0	TEACHERS HOSPITAL RIO PIEDRAS, PR OCCUPATION MEDICAL	005 10/17/79	\$75.00	YEAR TOTAL	\$25.00
009280JSS019L1	MR. LOLD DE JESUS EC TERTUGO KIL 19 N 7 RIO PIEDRAS, PR. 00928	SELF EMPLOYED RIO PIEDRAS, PR OCCUPATION FACTORY WORKER	007 10/18/79	\$10.00	YEAR TOTAL	110.00
009190MSS000J1	MR. J. V. DE MESE PR55599 HATC REY. PR. 00919	SELF EMPLOYED SAN JUAN PUERTO RICO, SS 5596 OCCUPATION CORP. OFFICER	004 09/28/79	\$200.00	YEAR TOTAL	1200.00
009260RLD314M0	MS. MILBA M. DE ROLDAN MONTGOMERY 314 SAN GERALDO RIO PIEDRAS, PR. 00926	STATE INSURANCE FUND RIO PIEDRAS, PR OCCUPATION LAWYER	007 10/18/79	\$10.00	YEAR TOTAL	110.00
009230VNC762J4 (809) 751-8710	MRS. JULIA R. DE VINCENTI JULIA 762 LOPEZ SICARDI AVE RIO PIEDRAS, PR. 00923	GOVT OF PUERTO RICO SAN JUAN, PR. 99999 OCCUPATION BUSINESS EXECUTIVE	003 06/19/79 009 09/28/79 003 10/18/79	\$500.00 \$60.00 \$200.00	YEAR TOTAL	1760.00
009240LGC0241A1	MR. ANTONIO R. DELGADO CCLINAS DE MONTECADO CALLE 2 F 1241 RIO PIEDRAS, PR. 00924	STATE INSURANCE FUND RIO PIEDRAS, PR OCCUPATION LAWYER	007 10/18/79	\$5.00	YEAR TOTAL	85.00
009240LGC040T4	MRS. TILLE DELGADO CALLE RUISENER #940 COUNTRY CL RIO PIEDRAS, PR. 00924	OCCUPATION HOMEMAKER	007 10/18/79	\$20.00	YEAR TOTAL	120.00
00927FG0168JG5	DR. GABRIEL FACOT 1603 GARDENIA ST RIO PIEDRAS, PR. 00927	SELF-EMPLOYED RIO PIEDRAS PUERTO RICO, SS 9 OCCUPATION DOCTOR	005 09/28/79	\$25.00	YEAR TOTAL	125.00

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00918FHTN74304

MRS. DELIA FORTUÑO
 243 WOODSELT AVE
 HATCHER, PR 00918

Personal

SELF EMPLOYED
 HATCHER, PR
 OCCUPATION BUSINESS EXECUTIVE

001 11/07/79

3100.00

YEAR TOTAL 3100.00

00904FRNC467H1
 723-3511

MR. HERRAN R. FRANCO
 BOX 3967
 OLD SAN JUAN, PR 00904

SELF EMPLOYED
 OLD SAN JUAN, PR
 OCCUPATION LAWYER

306 11/13/79

350.00

YEAR TOTAL 350.00

00657FNT5000R1
 783-6303

MR. RAFAEL FUENTES
 RAFAEL
 COND GARDEN HILLS PLAZA 1 #504
 GUAYNABO, PR 00657

8

STATE INSURANCE FUND
 GUAYNABO, PR
 OCCUPATION STATE GOVERNMENT

003 10/31/79

3250.00

YEAR TOTAL 3250.00

00907FRT5823R1

MR. RAFAEL R. FUERTES
 823 PARTI STREET
 SANTURCE, PR 00907

SELF EMPLOYED
 SAN JUAN PUERTO RICO, SS 5595
 OCCUPATION ACCOUNTANT

004 09/28/75

325.00

YEAR TOTAL 325.00

00925GRRG168J1

MR. JOSE GARRIGA
 ARZUAGA 168
 RIO PIEDRAS, PR 00925

GARRIGA MEJO
 RIO PIEDRAS PUERTO RICO.
 OCCUPATION BUSINESS EXECUTIVE

006 09/28/79

3100.00

YEAR TOTAL 3100.00

00920GDRU683V4

MRS. VICENTA GODREAU
 1683 ADMS ST SUMMIT HILLS R P
 RIO PIEDRAS, PR 00920

SAN JUAN MUNICIPAL GOVT
 SAN JUAN, PR
 OCCUPATION OFFICE WORKER

009 10/16/75

350.00

YEAR TOTAL 350.00

00928GNZL019G1

MR. GASPAR P. GONZALEZ
 MC TURTUGO KIL 16 M 3 BUZEN 38
 RIO PIEDRAS, PR 00928

SELF EMPLOYED
 RIO PIEDRAS, PR
 OCCUPATION FACTORY WORKER

007 10/10/79

310.00

YEAR TOTAL 310.00

00924GNZLZC6L0

MS. LYDIA T. GONZALEZ
 HIGHLAND PARK
 CALLE TAMARINDO 1206
 RIO PIEDRAS, PR 00924

SAN JUAN PUERTO RICO, SS 9595
 OCCUPATION LAWYER

004 05/28/75

325.00

004 05/28/79

325.00

YEAR TOTAL 350.00

00923GNZL062R5

DR. ROGELIO GONZALEZ
 URB VALENSIA
 CALLE PEREIRA LEAL 625
 RIO PIEDRAS, PR 00923

SELF EMPLOYED
 RIO PIEDRAS, PR
 OCCUPATION DOCTOR

003 10/10/79

3100.00

YEAR TOTAL 3100.00

00920GTRR317L1

MR. L CDO JOSI C. GUTIERREZ
 1317 CALLE 29 LRB MCNIECARLE
 RIO PIEDRAS, PR 00920

SELF EMPLOYED
 RIO PIEDRAS, PR
 OCCUPATION LAWYER

009 10/16/75

310.00

YEAR TOTAL 310.00

NOV 1977
CBO SAN JUAN, PR 00901

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OCCUPATION LAWYER

YEAR TOTAL 100.00

00928ITHRV19F5

DR. FERNANDO L. ITURBERO
1919 PASTORALIA ST SANTA MARIA
RIO PIEDRAS, PR 00928

SELF EMPLOYED
410 PIEDRAS PUERTO RICO, SS 9
OCCUPATION MEDICAL

004 09/28/79 1100.00

YEAR TOTAL 1100.00

00925JMNZ054R4

MRS. ROSA M. JIMENEZ
54 BALBOA ST SANTA RITA
RIO PIEDRAS, PR 00925

DEPT OF EDUCATION P R GOVT
SAN JUAN PUERTO RICO, SS 9999
OCCUPATION EDUCATION

009 09/28/79 110.00

YEAR TOTAL 110.00

00910JL14605G4
788-1192

MRS. GILDA JULIA
GILCA
BCX 11605
SANTURCE, PR 00910

SELF EMPLOYED
SAN JUAN, PR
OCCUPATION REAL ESTATE

004 10/31/79 11,000.00

YEAR TOTAL 11,000.00

00919LCOT012M0

MS. MARIA S. LACOT
MS. LACOT
CALLE 12 DE OCTUBRE #400
PATEC KEY, PR 00919

GOVT OF PUERTO RICO
SAN JUAN PUERTO RICO, SS 9996
OCCUPATION EDUCATION

006 09/28/79 125.00

YEAR TOTAL 125.00

00731LEON731L1

MR. LUIS F V. LEON
BCX 731
PENCK, PR 00731

MUNICIPAL GOVT
PONCE PUERTO RICO, SS 9996
OCCUPATION CITY / COUNTY GOV

009 09/28/79 110.00

YEAR TOTAL 110.00

00928LSPR000E1

MR. ENRIQUE LESPIER
CALLE ESTEBAN GONZALES 862
RIO PIEDRAS PUERTO RICO, PR 0

OCCUPATION RETIRED

005 09/28/79 130.00

005 09/28/79 110.00

YEAR TOTAL 140.00

00657LPEZ000W1

MR. WILLIAM H. LOPEZ
BARRIC FRATILE
GLAYNABO, PR 00657

010 10/16/79 125.00

YEAR TOTAL 125.00

00619LBRI.019M1
785-0625

MR. MANUEL LOUBRIEL
SANTA ROSA
CALLE 19 BLOQUE 21 #7
BAYAMON, PR 00819

P R TELEPHONE CO
SAN JUAN PUERTO RICO, SS 9996
OCCUPATION BUSINESS EXECUTIVE

009 09/28/79 125.00

YEAR TOTAL 125.00

00936LUNA009S1

MR. S. LUNA
9 P C BOX 4051
SAN JUAN, PR 00936

SELF EMPLOYED
SAN JUAN, PR
OCCUPATION BUSINESS EXECUTIVE

014 11/23/79 1100.00

YEAR TOTAL 1100.00

00630NLVE008J1

MR. JORGE L. MALAVE
JEYCE
A-B MARGINAL ST URB LOS ANGELES
CAROLINA, PR 00630

SELF EMPLOYED
CAROLINA, PR
OCCUPATION ACCOUNTANT

009 10/16/79 125.00

YEAR TOTAL 125.00

IDENTIFICATION NUMBER	NAME AND ADDRESS	OCCUPATION	START DATE	AMOUNT	YEAR TOTAL
00929MRQ20031	MRS. JUDITH MARGUIZ PLAYA DEL MERCADO RIO PIEDRAS, PR 00928	SELF EMPLOYED RIO PIEDRAS, PR OCCUPATION BUSINESS EXECUTIVE	006 10/18/79	\$200.00	YEAR TOTAL 1200.00
00925MRRR055F4	MRS. FRANCISCA C. MARRERO DOMINGO MARRERO #55 RIO PIEDRAS, PR 00925	OCCUPATION HOMEPAKER	002 10/02/79	\$25.00	YEAR TOTAL 125.00
00630MRTN001C1	MR. CARLOS MARTINEZ CARLES UNTEGENV-1 VALLE ARRIPIA HTS CAROLINA, PR 00630	STATE INSURANCE FUND SAN JUAN, PR OCCUPATION INSURANCE	004 10/31/79	\$11.00	YEAR TOTAL 111.00
00924MDRO605G1	MR. GUMERSINDO MEDERO SIMPITT HILLS 1405 ADAMS ST GUAYNABO, PR 00924	OCCUPATION RETIRED	007 10/18/79	\$5.00	YEAR TOTAL 15.00
00925MLNA708C4	MRS. DAISY F. MOLINA 900 PELEGRINA ST SANTA RITA RIO PIEDRAS, PR 00925	OCCUPATION HOMEMAKER	009 09/28/79	\$50.00	YEAR TOTAL 850.00
00925MRLS001A1	MR. ALEJANDRO MORALES CALLE 1 #28 F50 E GONZALEZ RIO PIEDRAS, PR 00925	OCCUPATION RETIRED	005 05/28/79	\$10.00	YEAR TOTAL 110.00
00905MRLS062F1	MR. FEMIN R. MORALES P C EGA 4862 SAN JUAN, PR 00905	SELF EMPLOYED SAN JUAN PUERTO RICO, PR 00905 OCCUPATION BUSINESS EXECUTIVE	006 09/28/79	\$100.00	YEAR TOTAL 8100.00
00928MERG002M1	MR. MARCOS V. MUERG R D 7 #2 BUZON #39 RC TORTUGA RIO PIEDRAS, PR 00928	CITY HALL SAN JUAN, PR OCCUPATION FACTORY WORKER	007 10/18/79	\$10.00	YEAR TOTAL 110.00
00768MN12074F1	MR. FELIX G. MUNIZ P C BOX 74 YAUCCO, PR 00768	SELF-EMPLOYED YAUCCO PUERTO RICO, PR 00768 OCCUPATION BUSINESS EXECUTIVE	005 09/28/79	\$200.00	YEAR TOTAL 1200.00
00760NGRN300PS	COL. PEDRO S. AEGRON ANTILLES MILITARY SCH BOX 646 TRUJILLO ALTO, PR 00760	SELF EMPLOYED TRUJILLO ALTO PR, PR 00760 OCCUPATION EDUCATION	004 09/28/79	\$100.00	YEAR TOTAL 8100.00

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CLAYVILLE, PA. 00657

OCCUPATION: HOME MAKER

YEAR TOTAL

YEAR TOTAL

00657TAL1001J1

MR. JAMES TEALI
SLEEVILLE RD 1
CLAYVILLE, PA 00657

LAA
SAN JUAN PUERTO RICO, SS
OCCUPATION COMP. OFFICER

007 09/28/79

\$100.00

YEAR TOTAL

\$100.00

00924THLL044G1
762-3301

MR. GILBERTO S. THILLET
GILBERTO
CALLE 44 F-7 COL DE MONTECARLO
RIO PIEDRAS, PR 00924

STATE INSURANCE FUND
SAN JUAN, PR
OCCUPATION EDUCATION

003 10/31/79

\$250.00

YEAR TOTAL

\$250.00

00918TLLY401T1

MR. THOMAS C. TILLEY
401 TEACHERS ASSN BLDG
NATC REY, PR 00918

SELF EMPLOYED
SAN JUAN PUERTO RICO, SS \$555
OCCUPATION LAWYER

004 06/28/79

\$50.00

YEAR TOTAL

\$50.00

00928TOR0122A1

MR. ARTURO O. TORO
BOX 20122 RIO PIEDRAS
RIO PIEDRAS, PR 00928

SELF EMPLOYED
RIO PIEDRAS, PR
OCCUPATION LAWYER

007 10/18/79

\$100.00

YEAR TOTAL

\$100.00

00907TRRN000L1

MR. L. TORRENS
CONDOMINIO CENTRO DE ALTAMIRA
PUERTO NUEVO, PR 00907

SELF EMPLOYED
RIO PIEDRAS, PR
OCCUPATION BUSINESS EXECUTIVE

001 11/07/79

\$200.00

YEAR TOTAL

\$200.00

00923TRRS010A1

MR. AMERICO J. TORRES
CALLE BLANES C-10 URB VILLA AN
RIO PIEDRAS, PR 00923

FEDERAL PROGRAM OFFICE
OCCUPATION U. S. GOVERNMENT

010 10/16/79

\$25.00

YEAR TOTAL

\$25.00

00924TRRS000A1

MR. ANTONIO A. TORRES
CALLE 42 E 37 COLINAS DE MONLC
C/O PEDRO J ACLVEDO TORRES
RIO PIEDRAS, PR 00924

STATE INSURANCE FUND
RIO PIEDRAS, PR
OCCUPATION LAWYER

007 10/18/79

\$20.00

YEAR TOTAL

\$20.00

00921TRRS175E0

MS. ESTHER TORRES
CALLE BUDAPEST NC 1750
COLLEGE PARK, PR 00921

OCCUPATION HOME MAKER

009 09/28/79

\$100.00

YEAR TOTAL

\$100.00

00619TRRS00501

MR. EVIDIO R. TORRES
CV10C
CALLE S M-29 SANTA MONICA
DAYAMON, PR 00619

STATE INSURANCE CC
SAN JUAN, PR
OCCUPATION ACCOUNTANT

003 10/31/79

\$250.00

003 10/31/79

\$250.00

YEAR TOTAL

\$500.00

00731TRRL266J1

MR. JOSE A P. TORRUPELLA
BOX 266
PONCE, PR 00731

SELF EMPLOYED
PONCE PUERTO RICO,
OCCUPATION LAWYER

004 10/01/79

\$10.00

YEAR TOTAL

\$10.00

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				YEAR TOTAL	
006570LVHJ00W1	MR. WALLACE G. OLIVER BLVD HERNANDEZ DE ARELLANO 2-10 GUAYNABO, PR 00950	HANCO DE SAN JUAN SAN JUAN PUERTO RICO, SS 9095 OCCUPATION CORP. OFFICER	004 09/28/79	\$200.00	\$200.00
009J60RTZ98654	MRS. SILVIA M. ORTIZ G P C BOX 04962 SAN JUAN, PR 00936	OCCUPATION HOUSEMAKER	002 10/02/79	\$100.00	\$100.00
00927PBCN000L0	MS. LYDIA PABON P R JUNIOR COLLEGE APTDO 25 RIO PIEDRAS, PR 00927	P R JUNIOR COLLEGE RIO PIEDRAS PUERTO RICO, SS 9 OCCUPATION EDUCATION	004 09/28/79	\$60.00	\$60.00
00918PLRM522J1	MR. JUAN A. PALERM 527 UESCSA ST HATO REY SAN JUAN, PR 00918	COMMONWEALTH OF P R OCCUPATION U. S. GOVERNMENT	001 06/05/79	\$100.00	\$100.00
00630PROS510V4 768-4276	MRS. VIOLETA PARADIS MRS PARADIS 1510 BARRACUDA ST BANIA VISTAM CAROLINA, PR 00630	GOVERNMENT OF PUERTO RICO SAN JUAN, PR OCCUPATION STATE GOVERNMENT	009 09/28/79 003 10/31/79	\$100.00 \$250.00	\$350.00
00911PREZ053V1	MR. VICENTE A. PEREZ CALLE LAPIA #53 OCEAN PARK SANTUICE, PR 00911		010 10/16/79	\$25.00	\$25.00
00913PRAS507J1	MR. JAIME PIERAS, JR JAIME BOX 507 HATO REY, PR 00913	SELF EMPLOYED HATO REY PUERTO RICO, SS 9595 OCCUPATION LAWYER	009 09/28/79	\$100.00	\$100.00
00731PVHR266J1	MR. JOSE A. PERANTOS BOX 266 PENCE, PR 00731	SELF EMPLOYED FONCE PUERTO RICO.	004 10/01/79	\$100.00	\$100.00
00654RMRZ206A0 792-5882	MS. ALIDA L. RAMIREZ ALIDA COND BELEN #1206 SAN PATRICIO GUAYNABO, PR 00854	STATE INSURANCE FUND SAN JUAN, PR OCCUPATION STATE GOVERNMENT	003 10/31/79	\$250.00	\$250.00
00657MTLJ011MZ	MATILDE RAMRAMIREZ DE ARELLANO MS. RAMIREZ DE ARELLANO CLEVELAND E 11 PARKVILLE GUAYNABO, PR 00857	DPT OF HOUSING SAN JUAN PUERTO RICO, SS 9595 OCCUPATION STATE GOVERNMENT	004 09/28/79 004 09/28/79	\$25.00 \$25.00	\$50.00

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MR. DENJIRO RIVERA
 1121 DAMASCC
 RIO PIEDRAS, PR 00928

OCCUPATION HOMEMAKER

YEAR TOTAL \$100.00

00909R105456K1

MR. ROSENDO RIOS
 CALLE ALPENTIC 1456 SANTURCE P
 SANTURCE, PR 00909

STATE INSURANCE FUND
 SAN JUAN, PR
 OCCUPATION PHARMACIST

009 10/16/79 \$100.00

YEAR TOTAL \$100.00

00910HVRA69701

MR. DENJIRO RIVERA
 PCA 8657
 SANTURCE, PR 00910

P R I D C O
 SAN JUAN PUERTO RICO, SS 9995
 OCCUPATION EDUCATION

009 09/28/79 \$60.00

YEAR TOTAL \$60.00

00923RVRA76201
 751-8710

MR. DENJIRO RIVERA *Fabriquez*
 DENJIRO
 762 LOPEZ SICARDO
 RIO PIEDRAS, PR 00923

P R INDUSTRIAL DEVELOPMENT CO/
 HATO REY, PR
 OCCUPATION ENGINEER

003 10/31/79 \$250.00

YEAR TOTAL \$250.00

00928RVRA019R1

MR. RAMON N. RIVERA
 EC TERTUGC KIL 19 M 5 BUZEN 41
 PENCE, PR 00928

C R U V
 RIO PIEDRAS, PR
 OCCUPATION FACTORY WORKER

007 10/18/79 \$10.00

YEAR TOTAL \$10.00

00925RVRA055R4

MRS. RUTH N. RIVERA
 55 COMINGC CABRERA ST STA RITA
 RIO PIEDRAS, PR 00925

OCCUPATION HOMEMAKER

009 10/16/79 \$5.00

YEAR TOTAL \$5.00

00910RDRG69701

MR. DENJIRO R. RODRIGUEZ
 BLX 8697
 SANTURCE, PR 00910

P R I D C O
 SAN JUAN PUERTO RICO, SS 9995
 OCCUPATION EDUCATION

009 09/28/79 \$100.00

YEAR TOTAL \$100.00

00925HORGS04J1
 (25)

MR. JORGE A. RODRIGUEZ
 NC 504 E OF DARLINGTON
 RIO PIEDROS, PR 00925

SELF EMPLOYED
 RIO PIEDROS PUERTO RICO,
 OCCUPATION ARCHITECT

007 09/28/79 \$500.00

YEAR TOTAL \$500.00

00920RDRG321J1
 (809) 783-8633

MR. JOSE RODRIGUEZ
 1J21 DAMASCC
 PUERTO NUEVO, PR 00920

GEORGE WASHINGTON UNIVERSITY
 WASHINGTON, DC 99995
 OCCUPATION STUDENT

009 09/26/79 \$25.00

010 11/29/79 \$50.00

YEAR TOTAL \$75.00

00057RDRG009L1

MR. LCDR A J. RODRIGUEZ
 ATALAYA # D-9
 GUAYNABO, PR 00057

010 10/16/79 \$300.00

YEAR TOTAL \$300.00

00708RDRG385R1

MR. RAFAEL C. RODRIGUEZ
 P O PCA 385
 MAYAGUEZ, PR 00708

SELF EMPLOYED
 OCCUPATION BUSINESS EXECUTIVE

006 09/28/79 \$100.00

YEAR TOTAL \$100.00

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3
CALLE TAMARINCO 1206 HIGHLAND
RIO PIEDRAS, PR 00924

DEFINITION STATE GOVERNMENT

YEAR TOTAL 1200.00

00619RDR000561

MR. MEDIO RODRIGUEZ TORRE
CIVICIL
CALLE 5 M-29 SANTA MONICA
BAYAMON, PR 00619

STATE INSURANCE FUND
SAN JUAN, PR
OCCUPATION ACCOUNTANT

003 10/31/79 860.00

YEAR TOTAL 860.00

00923HDR076201

9
MR. DENJIRO R. RODRIGUEZ
722 LOPEZ SICARD
RIO PIEDRAS, PR 00923

P R INDUSTRIAL DEVELOPMENT
HATO REY, PR
OCCUPATION ENGINEER

003 10/31/79 1250.00

YEAR TOTAL 1250.00

00924RDR0206M0

MS. MILLIE RODRIGUEZ
HIGHLAND PARK
CALLE TAMARINCO 1206
RIO PIEDRAS, PR 00924

SAN JUAN PUERTO RICO, SS 9999
OCCUPATION LAWYER

004 05/28/79 825.00
004 05/28/79 825.00

YEAR TOTAL 1650.00

00924RDR0205U1

MR. ULISES O. RODRIGUEZ
APTC 205 CCND EL BOSARIO PDA
SANTURCE, PR 00924

STATE INSURANCE FUND
RIO PIEDRAS, PR
OCCUPATION LAWYER

007 10/18/79 810.00

YEAR TOTAL 810.00

00612RURE354V1

MR. VICENTE R. ROURE
BOX 354
ARECIBO, PR 00612

SELF EMPLOYED
ARECIBO PUERTO RICO, SS 99999
OCCUPATION INVESTOR

009 09/28/79 8200.00

YEAR TOTAL 8200.00

00919SLAS367A1

MR. ANTONIO S. SALAS
P O BOX 367
HATO REY, PR 00919

STATE INSURANCE FUND
BAYAMON PUERTO RICO, SS 99999
OCCUPATION STATE GOVERNMENT

009 09/28/79 825.00

YEAR TOTAL 825.00

00920SRRN019H1

MR. MAXIMO D. SERRANO
BE TERTUGG K 19 M 5
RIO PIEDRAS, PR 00928

CITY HALL SAN JUAN
RIO PIEDRAS, PR
OCCUPATION FACTORY WORKER

007 10/18/79 85.00

YEAR TOTAL 85.00

00910SLBN005R1
788-1192

15
MR. RAUL SLADIN
RAUL
BOX 11605
SANTURCE, PR 00910

SELF EMPLOYED
SAN JUAN, PR
OCCUPATION REAL ESTATE

003 10/31/79 81,000.00

YEAR TOTAL 81,000.00

00625SOSA066M1

MR. MUGH F. SOSA
BOX 066
CAGUAS, PR 00625

SELF EMPLOYED
CAGUAS PUERTO RICO, SS 99999
OCCUPATION FARMER

004 09/28/79 825.00

YEAR TOTAL 825.00

00936SREZ000C1

MR. DIEGO SUAREZ
CRUCE BUCHANAN M CATANO
SAN JUAN, PR 00936

V SUAREZ & CO
SAN JUAN PUERTO RICO, SS 9999
OCCUPATION CORP. OFFICER

009 09/28/79 8200.00

YEAR TOTAL 8200.00

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GENERAL
REG. 1007
ARBUCLY, PR 00612

OCCUPATION ACCOUNTANT

YEAR TOTAL \$100.00

00924UIN5058C1

MR. CARLOS C. DEINAS
MANIONES DE CAROLINA
CALLE 58 BLUEFUL N N 27
CAROLINS, PR 00924

STATE INSURANCE FUND
RIO PIEDRAS, PR
OCCUPATION LAWYER

007 10/18/79 \$10.00

YEAR TOTAL \$10.00

00922V55L519E1

MR. EMILIO M. VASSALLO
BOX 10515
CAPARRA HEIGHTS, PR 00922

SELF EMPLOYED
RIO PIEDRAS, PR
OCCUPATION ACCOUNTANT

035 10/17/79 \$100.00

YEAR TOTAL \$100.00

00923VNCN762J1

MR. JOSE A. VINCENTI
762 LOPEZ SICARDO AVE
RIO PIEDRAS, PR 00923

OCCUPATION RETIRED

004 10/31/76 \$250.00
004 10/31/79 \$250.00

YEAR TOTAL \$500.00

00923VNCN762J4

MRS. JULIA R. VINCENTI
JULIA
762 LOPEZ SICARDO DOS FINES
RIO PIEDRAS, PR 00923

OCCUPATION HOUSEMAKER

006 10/18/79 \$100.00

YEAR TOTAL \$100.00

00619VNER431T1

MR. TOMAS VIVER
P O BOX 431
BAYAMON, PR 00619

SELF EMPLOYED
BAYAMON, PR 00619
OCCUPATION SUPERVISOR

010 10/16/79 \$100.00

YEAR TOTAL \$100.00

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Miss Ruth L. Rodriguez de Acevedo
Calle 42 E- 37
Colinas de Montecarlo
Rio Piedras, Puerto Rico 00924

Dear Miss Rodriguez:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited.

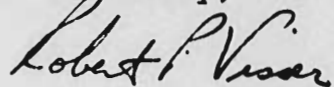
Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

We thank you very much for your interest and support and would be pleased to answer any further questions you

Miss Ruth L. Rodriguez de Acevedo
December 28, 1979
Page 2

may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

31010231213

RPV;jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Miss Maria L. Rojas de Almestica
Calle 206 GV-12
Country Club
Rio Piedras, Puerto Rico 00924

Dear Mis Rojas de Almestica:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

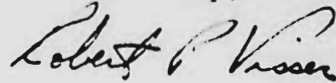
The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Miss Maria L. Rojas de Almestica
December 28, 1979
Page 2

We thank you very much for your interest and support
and would be pleased to answer any further questions you
may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

31710236215

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. John T. Ramirez de Arellano
Cleveland E, Street
Parkville
Guaynabo, Puerto Rico 00657

Dear Mr. Ramirez de Arellano:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

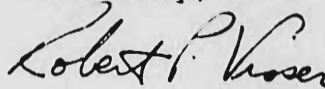
The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Mr. John T. Ramirez de Arellano
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

31010:8:007

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mrs. Magda Colli
363 San Jorge Street, Apt. 5
Santurce, Puerto Rico 00912

Dear Mrs. Colli:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

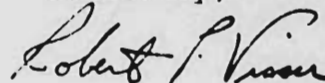
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Mrs. Magda Colli
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

31010131212

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Rafael Fuentes
Cond. Garden Hill Plaza Apt. 504
Cond. Garden Hill Plaza I
Guaynabo, Puerto Rico 00657

Dear Mr. Fuentes:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

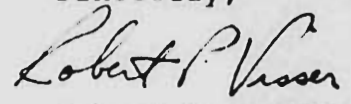
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Mr. Rafael Fuentes
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

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GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mrs. Violeta Paradis
1510 Barracuda Street
Bahia Vistamar
Carolina, Puerto Rico 00630

Dear Mrs. Paradis:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

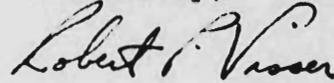
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Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Mrs. Violeta Paradis
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

31710233213

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Miss Alida Lopez Ramirez
Cond. Belen, Apt. 1206
Avenida San Patricio
Guaynabo, Puerto Rico 00654

Dear Miss Ramirez:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

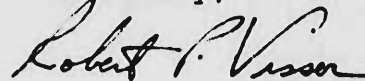
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Miss Alida Lopez Ramirez
December 28, 1979
Page 2

We thank you very much for your interest and support
and would be pleased to answer any further questions you
may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

31740235015

RPV: jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Denjiro Rivera Rodriquez
762 Lopez Sicardo
Rio Piedras, Puerto Rico 00923

Dear Mr. Rodriquez:

We have recently sent a letter to you requesting confirmation of your recent contributions to the George Bush for President committee in the amount of \$500.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

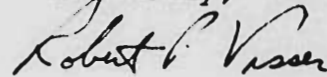
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Mr. Denjiro Rivera Rodriquez
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

81010337

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Raul Slabin
Box 11605
Santurce, Puerto Rico 00910

Dear Mr. Slabin:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$1,000.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a manager's check which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

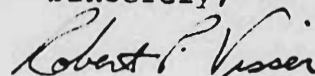
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Mr. Raul Slabin
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

3101023337

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Gilberto S. Thillet
Calle 44 - F-7,
Colinas de Montecarlo
Rio Piedras, Puerto Rico 00924

Dear Mr. Thillet:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

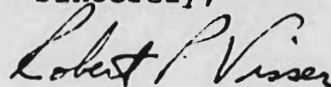
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Mr. Gilberto S. Thillet
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

3101023311

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Miss Millie Rodriguez Torres
Calle Tamarindo 1206, Highland Park
Rio Piedras, Puerto Rico 00924

Dear Miss Torres:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

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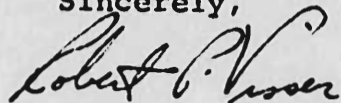
Of course, the Bush committee may accept an individual contribution of up to \$1,000.000 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

We thank you very much for your interest and support and

Miss Millie Rodriguez Torres
December 28, 1979
Page 2

would be pleased to answer any further questions you may have
with regard to this matter.

Sincerely,



Robert P. Visser,
General Counsel

31040:33:15

RPV:jc
cc: James A. Baker, III

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Ovidio Rodriguez Torres
Calle 5 M-29
Santa Monica
Bayamon, Puerto Rico 00619

Dear Mr. Torres:

We have recently sent a letter to you requesting confirmation of your recent contributions to the George Bush for President committee in the amount of \$500.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

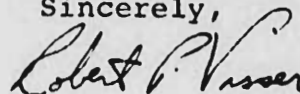
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Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Mr. Ovidio Rodriguez Torres
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

3101013115

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Pedro J. Acevedo Torres
Calle 42 - E-37
Colinas de Montecarlo
Rio Piedras, Puerto Rico 00924

Dear Mr. Acevedo:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$250.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

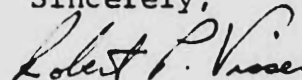
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Mr. Pedro J. Acevedo Torres
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

3101023117

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Jose A. Vincenti
762 Lopez Sicardo Avenue
Rio Piedras, Puerto Rico 00923

Dear Mr. Vincenti:

We have recently sent a letter to you requesting confirmation of your recent contributions to the George Bush for President committee in the amount of \$500.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of a corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

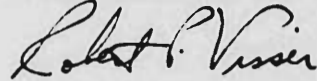
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Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Mr. Jose A. Vincenti
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

3174023110

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mrs. Guilda Julia
P.O. Box 11605
Santurce, Puerto Rico 00910

Dear Mrs. Julia:

Reference is made to your letter dated November 15, 1979, which has been referred to me for reply.

Following receipt of your letter, we reviewed the information provided by you relating to the stated corporate contributions to "Comite Pro Campana George Bush". It is our understanding that, although such checks may have originally been drawn up on such company accounts payable to the George Bush committee, these checks were returned. Subsequently, twelve checks, all dated September 6, 1979, in the amount of \$500.00 each were made by said companies payable to an account entitled "Ciudadano Pro Democracia" at the Banco De Ponce. Further, it is our understanding that these checks were converted into managers checks and money orders and forwarded to the Bush committee as individual contributions by certain named individuals in Puerto Rico, including yourself.

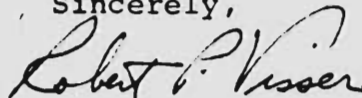
This is to advise you that the Federal Election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited. Accordingly, we enclose herewith our checks in the amount of \$500.00 each drawn to the order of the following corporations of which you personally own a majority or all of the stock and which apparently were the source of said unacceptable contributions.

1. San Juan Reality Corporation;
2. Industrial Warehouses, Inc.;
3. City Enterprises, Inc.;
4. Almac Enterprises, Inc.;
5. Castle Enterprises, Inc.;
6. Girafa, Inc.;
7. Silver, Inc.;
8. Triple A Investment, Inc.;
9. Leasing & Brokerage, Inc.;
10. Gateway Plaza, Inc.;
11. Puerto Nuevo Distribution Center, Inc.;
12. Puerto Nuevo Development Corporation.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal and not corporate funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

31210293251

3 1 3 4 0 1 3 1 1 1 1 1 1

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980

710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
in Houston
802 Main PO Box 2555 Houston, Texas 77002

No 4128

December 19, 1979

DOLLARS \$ 500.00

GEORGE BUSH FOR PRESIDENT
FOR PRESIDENT \$ 500.00

Industrial Warehouses, Inc.
Attn: Gilda Julia
C P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

11 4 7 8 7 M

11 3 3 0 0 5 1 5 1

11 0 0 0 0 4 1 2 8 1 1

LEAFLET CHECKS - VISA

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4128

DETACH AND RETAIN THIS STATEMENT
The attached check is in payment of items shown hereon. If not correct please notify us promptly.

3 1 7 1 0 2 3 3 2 3 3

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
in Houston
100 Main St. Box 2551 Houston, Texas 77002

No 4129

December 19, 1979

PAY TO THE ORDER OF **GEORGE BUSH FOR PRESIDENT** \$ 500.00 DOLLARS \$ 500.00

City Enterprises, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

⑆00004129⑆

⑆113000515⑆

CLARE CHECKS, INC.

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00
		No 4129

DETACH AND RETAIN THIS STATEMENT
The attached check is in payment of items described above. If not correct please notify us promptly.

3 1 7 1 7 1 3 1 3 1

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
PH. 713-60P-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
IN 154951071
801 Main PO Box 2533 Houston Texas 77002

No 4130

December 19, 1979

PAY TO THE ORDER OF **GEORGE BUSH FOR PRESIDENT** DOLLARS \$ 500.00
FOR PRESIDENT

Almac Enterprises, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

14 4 7 1 7 11

⑆000004130⑆ ⑆123000515⑆

CLEAR CHECKS 4M

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

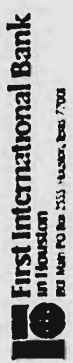
DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00
		No 4130

DETACH AND RETAIN THIS STATEMENT
The attached Check is in payment of items described above. If not correct please notify us promptly.

3 1 7 1 0 2 0 1 2 3 5

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024



No 4131

December 19, 1979

DOLLARS \$500.00

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

Castle Enterprises, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

14 4 7 1 7 1 1

1 1 3 0 0 0 5 1 5 1

1 1 0 0 0 0 4 1 3 1 1

CLEARING CHECKS - VW

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00
		No 4131

DETACH AND RETAIN THIS STATEMENT
The attached check is in payment of items described above. If you have any questions, please notify us promptly.

3 1 0 1 0 1 3 1 1 5

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

10 First International Bank
OF HOUSTON
300 Main PO Box 7555 Houston, Texas 77004

No 4132

December 19, 1979

DOLLARS \$500.00

GEORGE BUSH FOR PRESIDENT
FOR PRESIDENT 500 00 00

Girafa, Inc.
Attn: Gilda Julia
GPO Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

⑆ 4717 ⑈

⑆ 1130005151 ⑈

⑆ 00004132 ⑈

CLARK CHECKS, INC.

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00
		No 4132

DETACH AND RETAIN THIS STATEMENT
The attached check is not negotiable if this description of funds does not appear. Please advise us promptly if you receive a check with a description of funds that does not appear on this statement.

3 1 0 1 0 2 3 1 2 1 7

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
in Houston
801 Main St. Box 2555 Houston, Texas 77008

No 4133

December 19, 1979

PAY TO THE ORDER OF **GEORGE BUSH FOR PRESIDENT** \$ **500.00** DOLLARS \$ 500.00

Silver, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

⑆00004⑆33⑆ ⑆⑆⑆30005⑆5⑆ ⑆⑆⑆47⑆7⑆⑆

CLARKE CHECK - VW

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

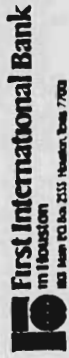
No 4133

DETACH AND RETAIN THIS STATEMENT
The attached check is payment of items described above. If not correct, please notify us promptly.

3 1 2 1 0 1 2 1 3

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024



No 4134

December 19, 1979

\$500.00

GEORGE BUSH FOR PRESIDENT
FOR PRESIDENT \$500.00 DOLLARS

Triple A Investment, Inc.
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

11 47 17 11

⑆00004134⑆ ⑆113000515⑆

UNABLE TO DEPOSIT

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00
		No 4134

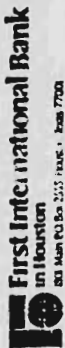
DETACH AND RETAIN THIS STATEMENT

The attached check is in payment of terms of the attached contract. Please notify us promptly.

31740 295337

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024



No 4135

December 19, 1979

PAY TO THE ORDER OF **GEORGE BUSH FOR PRESIDENT** \$500.00 DOLLARS \$500.00

Leasing & Brokerage, Inc.
Attn: Gilda Julia
GPO Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

⑆00004⑆35⑆ ⑆⑆30005⑆5⑆ ⑆⑆47⑆7⑆⑆

CLARET CHECKS, VW

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4

DETACH AND RETAIN THIS STATEMENT
The attached check is in payment of items described above. If not correct, please notify us promptly.

3 1 7 4 0 4 9 3 1 6 7

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GDP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
IN HOUSTON
801 Main St. Box 2533 Houston, Texas 77002

No 4136

December 19, 1979

PAY TO THE ORDER OF
GEORGE BUSH FOR PRESIDENT
FOR PRESIDENT 500.00 DOLLARS \$500.00

Gateway Plaza, Inc.
Attn: Gilda Julia
G.P.O. Box 11605
Santurce, PR 00910

George Bush for President
OPERATING ACCOUNT
Gilda Julia

⑆00004136⑆ ⑆113000515⑆ 14 4717⑆

CLARE CHECKS, INC.

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4136

DETACH AND RETAIN THIS STATEMENT
This attached check is in payment of money. If not correct, please notify us promptly.

3 1 3 4 9 2 3 3 3 3 1

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**
PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
an Equal Opportunity Lender
800 Main St. Houston, Texas 77002

No 4137

December 19, 1979

GEORGE BUSH FOR PRESIDENT
FOR PRESIDENT 500.00 DOLLARS \$ 500.00

PAY

TO THE ORDER OF

Puerto Nuevo Distribution Center, Inc.
Attn: Gilda Julia
G. P. O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

⑆00004137⑆ ⑆113000515⑆ 14 4717⑆

CLARET PAPER, VW

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00
		No 4137

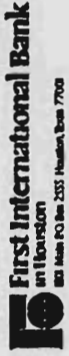
DETACH AND RETAIN THIS STATEMENT

The attached check is a payment of the amount stated in this statement and is not negotiable.

3 1 7 0 0 3 1 3 2

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024



No 4138

December 19, 1979

GEORGE BUSH FOR PRESIDENT 500 DOLLARS \$500.00
FOR PRESIDENT

PAY TO THE ORDER OF

Puerto Nuevo Development Corp.
Attn: Gilda Julia
P. O. Box 11605
Santurce, PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

⑆00004138⑆ ⑆113000515⑆

14 4787M

LEAFLET CHECKS - VM

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00
		No 4138

DETACH AND RETAIN THIS STATEMENT
The attached check is in payment of this bill. If you have any questions, please contact us promptly.

3 1 3 0 2 3 1 2 6 3

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-GDP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
OF HOUSTON
801 Main St. Box 255 Houston, Texas 77002

No 4127

December 19, 1979

GEORGE BUSH FOR PRESIDENT 500.00 DOLLARS \$500.00

PAY TO THE ORDER OF

San Juan Realty Corporation
Attn: Gilda Julia
G P O Box 11605
Santurce PR 00910

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

11 471711

⑆00004⑆27⑆⑆⑆⑆30005⑆5⑆

LARGE CHECKS, VW

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$500.00

No 4127

DETACH AND RETAIN THIS STATEMENT
The Attached Check is in Payment of Money. Please Do Not Cash or Deposit It Unless It is Promptly

GEORGE BUSH FOR PRESIDENT

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

December 28, 1979

Mr. Isidoro Roffe
Coamo Fashions, Inc.
Quisqueya 171
Hato Rey, Puerto Rico 00917
Dear Mr. Roffe:

It has recently come to our attention that your company's check, dated October 8, 1979, in the amount of \$200,000 was subsequently contributed to and partially expended in connection with the George Bush for President committee. This is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited. And accordingly, I enclose herewith our check in the amount of \$47.98, as well as a money order in the amount of \$152.02 the latter representing the balance of the funds which were not expended in connection with campaign activities in Puerto Rico.

If course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you or others in your company would individually like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Attachment #08

3 1 1 0 0 2 3 0 3 4



AMERICAN EXPRESS COMPANY
 7655 WEST MISSISSIPPI AVENUE
 DENVER COLORADO 80220
 PURCHASER'S RECEIPT FILE IN KEEP IN
 YOUR RECORD

64-977,822.512

AMOUNT DATE

SENT TO

FOR

AMERICAN EXPRESS COMPANY

TO THE
 ORDER OF

DATE 12/18/79

Coamo Fashions, Inc

PAY THE SUM OF
 \$15,000.00

POST OAK BANK 15,000.00

SENDER'S NAME AND ADDRESS

AMERICAN EXPRESS COMPANY
 DENVER, COLORADO

⑆1020⑉000⑆⑉0⑆⑉9778225122⑈

BEFORE CASHING READ NOTICE ON BACK

64-977,822.512

64-977,822.512

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Ehret, Inc.
G.P.O. Box 6045
San Juan, Puerto Rico

Attn: President and General Manager

Gentlemen:

It has recently come to our attention that your company's check, dated October 8, 1979, payable to the order of Ciudadano Pro Democracia in the amount of \$200.00 was subsequently contributed to and expended in connection with the George Bush for President committee. This is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited. Accordingly, I enclose herewith our check in the amount of \$200.00 to the order of Ehret, Inc.

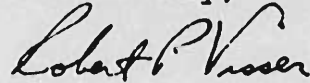
Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you or others in your company would individually like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

We thank you very much for your interest and support

Ehret, Inc.
December 28, 1979
Page 2

and would be pleased to answer any further questions you
may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

31040231159

3 1 7 1 0 1 7 1 2 7 7

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
in Houston
800 Main PO Box 2555 Houston, Texas 77003

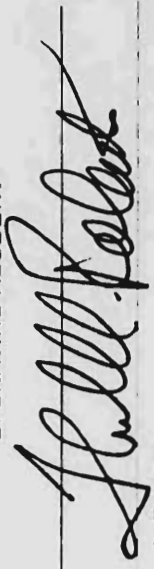
No 4122
December 19, 1979

GEORGE BUSH FOR PRESIDENT
FOR PRESIDENT 200 000 00 DOLLARS \$200.00

PAY TO THE ORDER OF

Ehret Inc.
Attn: President and General Manager
G. P. O. Box 6045
San Juan PR 00936

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT



⑆00004122⑆ ⑆113000515⑆ 11 4717⑆

CLARET CHE #5, SW

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79		\$200.00

No 4122

DETACH AND RETAIN THIS STATEMENT
The attached check is in payment of terms described above. If not correct please notify us promptly

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Manuel L. Lompart
Hospital Supply Company
G.P.O. Box 1516
San Juan, Puerto Rico 00936

Dear Mr. Lompart:

It has recently come to our attention that your company's check, dated October 8, 1979, and payable to the order of Ciudadanos Pro Democracia in the amount of \$100.00 was subsequently contributed to and expended in connection with the George Bush for President committee. This is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person are also prohibited. Accordingly, I enclose herewith our check in the amount of \$100.00 to the order of Hospital Supply Company.

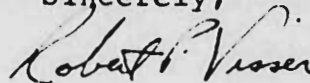
Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you or others in your company would individually like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

We thank you very much for your interest and support

Mr. Manuel L. Lompart
December 28, 1979
Page 2

and would be pleased to answer any further questions you
may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

31010236272

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Manuel Vallecillo
Pueblo International, Inc.
G P O Box 3288
San Juan, Puerto Rico 00936

Dear Mr. Vallecillo:

It has recently come to our attention that your company's check, dated October 2, 1979, payable to the order of Alfredo Ramirez de Arellano in the amount of \$200.00 was subsequently contributed to and expended in connection with the George Bush for President committee. It is our understanding that the funds for such contribution did not represent Mr. Arellano's personal funds but were actually those of your corporation. If this contribution did not represent his personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited. Accordingly, I enclose herewith our check in the amount of \$200.00 to the order of Pueblo International, Inc.

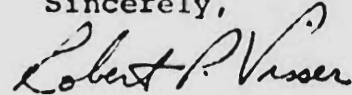
Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you or others in your company would individually like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

310101033274

Mr. Manuel Vallecillo
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

31710181173

3 1 7 1 0 2 7 3 3 1 5

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
in Houston
Box 10000 Houston, Texas 77036

No 4126

December 19, 1979

GEORGE BUSH FOR PRESIDENT
FOR PRESIDENT 200 000 00

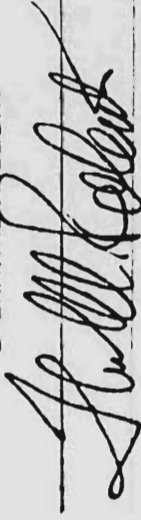
DOLLARS \$200.00

PAY

TO
THE
ORDER
OF

Pueblo International, Inc.
Attn: Lic. Manuel Vallecillo
G P O Box 3288
San Juan PR 00936

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT



⑆00004126⑆ ⑆⑆⑆30005⑆5⑆

⑆⑆4717⑆

CLARICHECKS, INC.

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$200.00
		No 4126

DETACH AND RETAIN THIS STATEMENT
The attached check is in payment of this check. If not correct please notify us promptly.

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Puerto Rico Oil Co., Inc.
G.P.O. Box 3267
San Juan, Puerto Rico 00936

Attn: Mr. President

Dear Sir:

It has recently come to our attention that your company's check, dated October 31, 1979, payable to the order of Ciudadanos Pro Democracia in the amount of \$200.00 was subsequently contributed to and expended in connection with the George Bush for President committee. This is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited. Accordingly, I enclose herewith our check in the amount of \$200.00 to the order of Puerto Rico Oil Co., Inc.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you or others in your company would individually like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

3101033077

3 1 7 4 0 1 3 1 1 7 7

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
in Houston
800 Main PO Box 2551 Houston Texas 77003

No 4123

December 19, 1979

\$200.00

DOLLARS

200.00

200.00

200.00

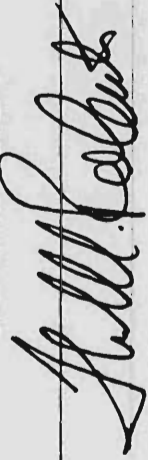
200.00

PAY

TO
FOR
ORDER OF

Puerto Rico Oil Co., Inc.
Attn: Mr. President
G. P. O. Box 3267
San Juan PR 00936

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT



1100000412311

11330005151

114471711

LEONARD CHERRY, VW

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79		\$200.00

No 4123

DETACH AND RETAIN THIS STATEMENT
The attached check is in payment of items described above. Please contact the issuer promptly.

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

December 28, 1979

Mr. Eliezar Martinex
United Sales Electronic & Service, Inc.
G.P.O. Box 11209
Hato Rey, Puerto Rico 00919

Dear Mr. Martinex:

It has recently come to our attention that your company's check, dated October 10, 1979, and payable to the order of the Ciudadanos Pro Democracia in the amount of \$200.00 was subsequently contributed to and expended in connection with the George Bush for President committee. This is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

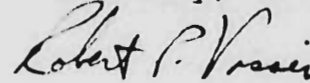
The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person are also prohibited. Accordingly, enclosed herewith is our check in the amount of \$200.00 to the order of United Sales Electronic & Service, Inc.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you or others in your company would individually like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

Mr. Eliezar Martinex
December 28, 1979
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

31010236231

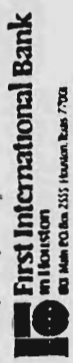
RPV:jc
cc: James A. Baker, III

REGISTERED MAIL
RETURN RECEIPT REQUESTED

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**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-60P-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024



N2 4125

December 19, 1979

DOLLARS \$ 200.00

GEORGE BUSH FOR PRESIDENT 200 00 00

United Sales Electronic & Service Inc.
Attn: Eliezar Martinex
G P O Box 11209
Hato Rey, PR 00919

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

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CLASS CHECKS - VW

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
12/19/79	Return of unacceptable contribution	\$200.00
		No 4125

DETACH AND RETAIN THIS STATEMENT
The attached check is in payment of items described above. If not correct, please notify us promptly.

GEORGE BUSH FOR PRESIDENT

112 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 14, 1980

Mr. Francisco M. Carrera
F.&J.M. Carrera, Inc.
Colle Comercio 452
San Juan, Puerto Rico 00936

Dear Mr. Carrera:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$200.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of your corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any Federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person are also prohibited. Accordingly, enclosed herewith is our check in the amount of \$200.00 to the order of F.&J.M. Carrera, Inc.

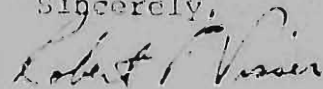
If course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

ATTACHMENT 8'A'

Mr. Francisco S. Carrera
January 14, 1960
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

31740173234

RIV:gc
cc: James A. Baker, III

REGISTERED MAIL RETURN RECEIPT REQUESTED

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

PH. 713-00P-1980

710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024

First International Bank
Member FDIC

No 4511

January 10, 1980

GEORGE BUSH FOR PRESIDENT 200 00

DOLLARS \$200.00

F. & J. M. Carrera, Inc.
Calle Comercio 452
San Juan, PR 00936

**GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT**

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GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
1, 10/80	Refund of unacceptable contribution	\$200.00
		No 4511

DETACH AND RETAIN THIS STATEMENT

31040:33235

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 14, 1980

Mr. Francisco Carvajal
President
Olympic Mills
P.O. Box A.A.
Guaynabo, Puerto Rico 00657

Dear Mr. Carvajal:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$100.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of your corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporations are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited. Accordingly, enclosed herewith is our check in the amount of \$100.00 to the order of Olympic Mills.

Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

31040131335

Mr. Francisco Carvajal
January 14, 1980
Page 2

We thank you very much for your interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

81040293297

RPV:jc
cc: James A. Baker, III
Encl.

REGISTERED MAIL RETURN RECEIPT REQUESTED

GEORGE BUSH FOR PRESIDENT
 OPERATING ACCOUNT
 PH. 713-809-1980
 710 NORTH POST OAK, NO. 205
 HOUSTON, TEXAS 77024



N2 4524

Jan 10 1980

GEORGE BUSH FOR PRESIDENT 100 00

DOLLARS \$ 100.00

Olympic Mills
 Attn: Mr. Carvajal
 P.O. Box A. A.
 Guaynabo, Puerto Rico 00657

GEORGE BUSH FOR PRESIDENT
 OPERATING ACCOUNT
[Signature]

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GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
10-80	Refund of unacceptable contribution	100.00
		N2 4524

8104031333

DETACH AND RETAIN THIS STATEMENT

GEORGE BUSH FOR PRESIDENT

732 North Washington Street
Alexandria, Virginia 22314
(703) 836-5705

710 North Post Oak Road
Suite 208
Houston, Texas 77024
(713) 467-1980

January 14, 1980

Mr. S. Luna
President
Luna Paint
G.P.O. Box 4051
San Juan, Puerto Rico 00936

Dear Mr. Luna:

We have recently sent a letter to you requesting confirmation of your recent contribution to the George Bush for President committee in the amount of \$100.00.

It has recently come to our attention that the funds for such contribution do not represent your personal funds but are actually those of your corporation which were drawn to the order of Ciudadano Pro Democracia and converted into a money order which was enclosed along with a contribution card in your name. If this contribution did not represent your personal funds, this is to advise you that the Bush committee cannot accept such a contribution for the following reasons.

The Federal election campaign laws prohibit certain kinds of contributions made or received in connection with any federal election. In particular, contributions made from the treasuries of corporation are prohibited. In addition, contributions supplied by one person, but made in the name of another person, are also prohibited. Accordingly, enclosed herewith is our check in the amount of \$100.00 to the order of Luna Paint.

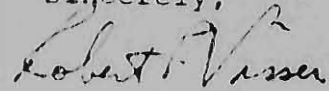
Of course, the Bush committee may accept an individual contribution of up to \$1,000.00 per person which is drawn upon personal funds. If you would like to make such a contribution to George Bush for President, please return a personal check along with an executed copy of the enclosed contribution card.

81040233339

Mr. S. Luna
January 14, 1980
Page 2

We thank you very much for interest and support and would be pleased to answer any further questions you may have with regard to this matter.

Sincerely,



Robert P. Visser
General Counsel

81040233270

RPV:jc
cc: James A. Baker, III
Encl.

REGISTERED MAIL RETURN RECEIPT REQUESTED

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT

PH. 713-GOP-1980
710 NORTH POST OAK, NO. 205
HOUSTON, TEXAS 77024



No 4525

Jan 10

1980

GEORGE BUSH FOR PRESIDENT 100 00

DOLLARS \$ 100.00

Lima Paint
Attn: Mr. Lunc
C.P.O. Box 4051
San Juan, Puerto Rico 00936

GEORGE BUSH FOR PRESIDENT
OPERATING ACCOUNT
Handwritten Signature

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⑆113000515⑆

14 1717⑈

GEORGE BUSH FOR PRESIDENT OPERATING ACCOUNT

DATE	DESCRIPTION	AMOUNT
1-10-80	Refund of unacceptable contribution	100.00
		No 4525

DETACH AND RETAIN THIS STATEMENT

81040233201

George Bush for President.

G. P. O. Box 682 San Juan,
Puerto Rico 00936 Tel. 751-8710

December 27, 1979

Hon. George Bush
710 North Post Oak Rd.
Suite 208
Houston, Texas 77024

Dear Mr. Ambassador:

Early this year you very kindly bestowed upon me the honor of heading your campaign for the presidency of the United States in the coming election year. Needless to say I gladly accepted the opportunity you gave me to serve my friend and my country.

It is with a heavy heart that I must tender my resignation to the appointment I so much cherished, effective December 31, 1979. I am forced to take this painful step because at the National Republican Party Convention held on the 21th of October 1979, in San Juan, P.R., I was elected National Committee Woman. My tenure begins January 1, 1980.

Our National Republican Party in an effort to give all presidential hopefuls who want to campaign in Puerto Rico for the presidential primaries to be held February 17, 1980, equal opportunity, has pledge that none of the top level officials (President, Chairman, 2 Vice Presidents and Chairwoman) would support or campaign for any presidential candidate in particular.

In as much as I am bound to honor my party pledge, I can not continue heading your campaign. Please be assured of my continued support as a concerned citizen who admires you and believes in your action program. The best of luck in the campaign ahead.

Yours sincerely,

Julia R. de Vincenti
Julia R. de Vincenti



Julita Rivera de Vincenti
Campaign Manager

ATTACHMENT 9 A

GEORGE BUSH
710 NORTH POST OAK ROAD
SUITE 208
HOUSTON, TEXAS 77024

(713) 467-1980

January 6, 1979

Honorable Julia R. De Vincenti
762 Lopez Sicardo Avenue
Dos Pinos, Rio Piedras
Puerto Rico 00923

Dear Julia,

With extreme regret, I received your December 27 letter of resignation effective January 1, when you assume the important position of National Committeewoman for Puerto Rico.

I am so deeply appreciative for the excellent job you did as my chairman. Without your leadership, the progress we made during 1979 would have been impossible.

Julia, thank you again for all you have done. I continue to value greatly our friendship.

Sincerely,

George Bush

81040233203
ATTACHMENT 9B

31010233294

I have read the contents of my deposition, taken on March 19, 1980 in the matter of the Federal Elections Commission. I am satisfied that its contents are accurate and reflect what was said on that day during the deposition.

In San Juan, Puerto Rico, this 14 day of April, 1980.

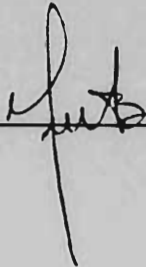
Julia De Vincenti

10 APR 21 P12:23

APR 21 1980
FBI - SAN JUAN

I have read the contents of my deposition, taken on March 19, 1980 in the matter of the Federal Elections Commission. I am satisfied that its contents are accurate and reflect what was said on that day during the deposition.

In San Juan, Puerto Rico, this 14th day of April, 1980.



81010231295

I have read the contents of my deposition, taken on March 20, 1980 in the matter of the Federal Elections Commission. I am satisfied that its contents are accurate and reflect what was said on that day during the deposition.

In San Juan, Puerto Rico, this ^{12th} day of April, 1980.

Paul P. Murray

91040193206

IN RE: :
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MUR-1181 :
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DEPOSITION OF:

RAFAEL FUENTES

March 19, 1980

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APPEARANCES:

ROBERT I. BOGIN, ESQ.
HAL PONDER, ESQ.
Federal Elections Commission
1325 K Street
Washington, D.C.

RAFAEL GEIGEL-VASSALLO, ESQ.
Pan Am Building - Suite 504
Hato Rey, Puerto Rico
Attorney for Julia Rivera De Vincenti, Rafael Fuentes and
Polly Alemany

BARBARA COHEN, Interpreter

1
2 MR. BOGIN: The attorneys for the Federal
3 Elections Commission are aware that you, as a
4 notary, will swear in the witness and the court
5 reporter and the translator, even though you
6 represent the witness in this matter.

7 That as a notary and your being able to do
8 that, we have no problem with your doing that in
9 this case.

10 I would like the record to reflect that I am
11 speaking to Mr. Geigel.

12 MR. GEIGEL: So it is at your request that I
13 am giving the oath. Also for the record, my name
14 is Rafael Geigel-Vassallo, I represent for the
15 purposes of this deposition, the witness.

16 I have made our client Vincenti aware that
17 I will be representing this witness at this
18 deposition. I have made Mr. Fuentes aware that
19 I represent Doña Julia. I have also made
20 Mr. Fuentes aware of his rights to not testify,
21 if it will be incriminating and he has waived that
22 right. He would like to cooperate. Of course we
23 have made the commission aware of the language
24 difference of the witness, who may understand or
25 have a problem in communicating the answers to

1
2 your questions in English. His native language is
3 Spanish, so that is why we have an interpreter
4 present. So, for the record, as best I will be
5 finishing off with my request to the Commission
6 to act as notary in this case.

7 I will start off with the witness.

8 (The deponent, the interpreter and the court
9 reporter were duly sworn by the notary.)

10 MR. BOGIN: This deposition is being taken
11 at the behest of the Federal Elections Commission
12 in connection with an investigation matter under
13 review 1181. The witness, Mr. Rafael Fuentes
14 is a witness and not subject to the investigation
15 at this time.

16 I should also point out that this investigation
17 is confidential under the Federal Elections
18 Campaign Act and that any information or any
19 discussion of these matters would be a violation of
20 the Act. So I am ready to start.

21 Whereupon,

22 RAFAEL FUENTES

23 was called as a witness and after first having been duly
24 sworn by the notary public, was examined and through the
25 interpreter testified as follows:

Federal Reporters
P.O. Box 1427
San Juan, PR 00903
723-1619 or 723-3836

EXAMINATION

BY MR. BOGIN:

Q Could you give us your name for the record.

A Rafael Fuentes.

Q Your occupation, sir?

A I am the aid to the executive director of the Industrial Hospital.

Q And what is that person's name?

A Efrain Flores.

Q And what did you do on your job? What is your responsibility?

A Mr. Flores assigns me the work to do. Besides that, I have my job description. I am the supervisor of different areas in the hospital.

Q Do you know a Mrs. De Vincenti?

A Yes, I do.

Q And how long have you known her?

A For about six or seven years.

Q Did you work with her in the George Bush for president committee?

A Yes, I did.

Q How did you come to work on the committee?

A Since I am a member of the New Progressive Party, we worked together for the party.

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Q Did Mrs. Vincenti ask you to work for this?

A Yes, she did.

Q What was your relationship with Mrs. Vincenti?

A Before that?

Q No, during, in the committee.

A Well, I used to go to the meetings, as a lot of people did.

Q Have you ever heard of a group called Ciudadanos Pro Democracia?

A Yes, I did.

Q When did you first hear about this group?

A I think it was last year, in September, October, August, I don't remember the exact date.

Q Where were you when you heard about this?

A In a meeting.

Q Did the idea for this group come out of that meeting?

A Yes.

Q Do you remember whose idea it was?

A Who gave the idea?

Q Yes.

A I don't remember. Somebody from the group.

Q Who was in the group?

A A lot of people. I don't remember, different

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people.

Q How many?

A Thirty-five, 40 or 50 persons.

Q Could you tell us what the purpose of that committee was, Ciudadanos Pro Democracia?

A It was to instruct the public concerning the primaries and statehood, the coming primaries and statehood, generally.

Q Was that the only purpose for the committee?

A At that time, yes.

Q Afterwards?

A Afterwards the people who belonged to that group worked for the candidacy of George Bush.

Q Was there a chairman of this committee, Ciudadanos Pro Democracia?

A It was a very informal group but most of the time Doña Julia De Vincenti directed the group. There was no one actually designated as a chairman.

Q Were all the same people that worked for the George Bush for president committee, involved with this group, Ciudadanos Pro Democracia?

A Not exactly, not everyone.

Q Were there different people, some different people?

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A Yes.

Q Were most of the people the same people?

A Yes.

Q Which came first, Ciudadanos Pro Democracia or George Bush for president committee?

A Ciudadanos Pro Democracia.

Q When was that, do you remember the date when that was?

A Not exactly.

Q Did Ciudadanos Pro Democracia have need of money to fund its activities?

A Yes.

Q Where did this money come from?

A Money came from corporations and then at one point someone mentioned the fact that we could not receive any money from the corporations. Money was returned to the corporations.

Q Who told you that you could not accept corporate money?

A Licenciado Rodriguez.

Q And were you present when he said that?

A Yes, I was.

Q How come the committee could not accept corporate checks?

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2 A He said reasons, the reasons were given
3 but I was not aware or I was not really concerned at that
4 moment with them.

5 Q I think there is a little confusion here.
6 George Bush for president committee could not accept
7 corporate checks, is that your understanding?

8 A Yes, I know it now.

9 MR. GEIGEL: The question is, do you know if
10 the committee for Bush could accept corporate
11 checks?

12 THE WITNESS: I don't know.

13 BY MR. BOGIN:

14 Q I will give you an opportunity to say something
15 later if you would like. Right now I would like to try to
16 ask some good questions.

17 Did you open a savings account for Ciudadanos Pro
18 Democracia?

19 A Yes.

20 Q Did you do it by yourself?

21 A No.

22 Q With another person?

23 A Yes.

24 Q And who was that other person?

25 A Polly Alemany.

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Q Were you directed to open an account?

A Yes.

Q By whom, who directed you?

A In a meeting it was suggested that a bank account be opened and I, with another person was suggested to do this.

Q Who was the person that suggested you to do this?

A Somebody from the group.

Q You don't remember the person?

A No.

Q You were present when your name was mentioned?

A Yes.

Q Even though you were present, you could not tell me who that person was?

A No.

Q Was this an open meeting where it was suggested that you do it?

A Yes.

Q Was Mrs. Rivera present?

A Yes.

Q Was Mr. Rodriguez present?

A I don't remember if he was present or not.

Q Did you deposit any money in the savings

1
2 account for Ciudadanos Pro Democracia?

3 A Yes, I did.

4 Q Whose money was that, do you remember whose
5 money that was?

6 A In the beginning the money was the checks
7 received from the corporations, made to George Bush, the
8 checks were given back to the corporations, mentioned before.

9 Somebody then asked to go back to those
10 corporations and ask if they could make the checks to
11 Ciudadanos Pro Democracia.

12 Q And who asked you to do that?

13 A It wasn't me. I did not go to the corporations.

14 Q But it is your understanding that these
15 checks which were originally paid with the payee, George
16 Bush for president committee, was not accepted that people
17 returned back to the corporations and were asked to write a
18 check out to Ciudadanos Pro Democracia?

19 A Yes, that is correct.

20 Q Was this discussed in a meeting?

21 A Yes.

22 Q Do you remember whose suggestion it was to
23 do this procedure?

24 A I don't remember.

25 Q Was there any discussion about it?

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2 A No, somebody said it from the floor and it was
3 accepted.

4 Q And you don't know who the person on the
5 floor who said it?

6 A No.

7 Q Then how did you get the checks that you put
8 into the savings account, who gave them to you?

9 A I did not take the checks, I did not have to
10 take the checks because it did not have to be the same
11 person to deposit the money who opened the account.

12 Q Did you deposit any money in the account?

13 A At one time I did make a deposit, personally.

14 Q Do you remember how much money that was?

15 A Not the exact amount. It could have been
16 400, \$800.

17 Q Did you ever hold in your hand checks made
18 by corporations, written out to Ciudadanos Pro Democracia?

19 A No.

20 Q How do you know that there were checks
21 written out to Ciudadanos Pro Democracia from corporations?

22 A Because they were deposited in that account
23 and that is what the meeting had agreed on at that time.

24 Q So you are basing your knowledge on what you
25 heard at the meeting?

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A Yes.

Q Do you know why it was suggested that you were to open up an account, why you, personally, why you were to open the account?

A Because I had more free time at that moment and I was closer to the bank.

Q And do you know why Polly Alemany also was selected to do that?

A No, I cannot say why.

Q Did you volunteer to open up the account?

A No.

Q Somebody said for you to open the account up?

A Exactly.

Q And you followed that instruction?

A Yes.

Q But you don't know who was the person that told you to do it?

A No, I don't.

Q How many meetings did you go to, of Ciudadanos Pro Democracia or the George Bush for president committee?

A About four or five.

Q How many meetings were there?

A I don't know exactly.

Q When did these meetings take place, mostly?

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A After five o'clock in the afternoon.

Q At the State Insurance Fund?

A Yes.

Q And how did the people know about these meetings?

A We said we will meet some time or someone would call.

(At which time there was a five minute recess.)

BY MR. BOGIN:

Q Mr. Fuentes, is Mrs. Vincenti your boss?

A As the head of the agency, she is but not as my supervisor, my immediate supervisor, no.

Q If she says something as head of the agency, do you obey her?

A Coming from her it would not be out of order but as a person I have a privilege to accept or reject what she has to say.

Q Did she ever direct you to do anything in connection with the George Bush for president committee?

A No.

Q With Ciudadanos Pro Democracia?

A No.

Q You said that earlier you met her for the first time, six or seven years ago in connection with what?

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A She was my boss in my previous job.

Q When she went to the State Insurance Fund, did you go with her?

A A month after.

Q Did she hire you?

A Yes, she did.

Q So you had a fairly close relationship in terms of employment with her?

A Yes.

Q What are your job duties right now at the State Insurance Fund?

A Administrative aid to the executive director of the hospital.

Q The executive director of the hospital?

A Yes.

Q In the hierarchy of the State Insurance Fund, where is the executive director of the hospital, is she right under Mrs. Vincenti?

A Yes.

Q Is Mrs. Vincenti her immediate supervisor?

A Yes, she is.

Q Do you have a lot of dealings with Mrs. Vincenti on a day to day basis?

A Not on a daily basis but there is a lot of

1
2 communication.

3 Q You are involved with a lot of meetings with
4 her for work?

5 A Regularly.

6 Q Do you ever discuss politics with Mrs. Vincenti?

7 A Yes but not in connection with work.

8 Q Outside of work you talk?

9 A Not at any indicated or particular moment
10 but whatever.

11 Q How do you know Polly Alemany?

12 A Because we worked together in the previous
13 job and in the State Insurance Fund.

14 Q What job does she have with the Fund?

15 A Administrative aid to Doña Molita,
16 administrative assistant to Doña Molita.

17 Q Did the fact that you were the executive
18 assistant to -- you are administrative assistant to the --
19 you have a high position then within the State Insurance
20 Fund.

21 A Not really, there are many people with the
22 same position, different departments.

23 Q When it was suggested in the meeting that
24 you open the account, you and Polly Alemany, to the best of
25 your knowledge did you know the reason for that was because

1
2 you knew Mrs. Vincenti?

3 A Not necessarily.

4 Q Where were the meetings held?

5 A At the State Insurance Fund.

6 Q In Mrs. Vincenti's office?

7 A In a conference room.

8 Q Did most of the people who came to these
9 meetings, were they also employees of the State Insurance
10 Fund?

11 A Not all of them.

12 Q Most of them?

13 A I cannot exactly tell you the proportion.

14 Q Where did Mrs. Vincenti sit in these meetings?

15 A Anywhere, there was no designated place.

16 She sat anywhere.

17 Q Were people sitting at the meetings?

18 A Some sitting, some standing.

19 Q Was she the chairman of these meetings?

20 A In most of the ones that I went, she was the
21 chairman but I did not go to all of the meetings.

22 Q Do you think that Mrs. Vincenti is a capable
23 head of the State Insurance Fund?

24 A Yes.

25 Q Is she a strong person?

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A In what sense?

Q In the sense that she gets her way, runs a tight ship, so to speak?

A She knows how to ask for things but she is not the classical domineering person.

Q Is she well respected?

A Yes.

Q Do people usually listen to what she says?

A Yes.

Q As head of the agency, as head of the State Insurance Fund, when she comes into the room, do people listen to what she has to say ?

A Yes.

Q Who else participates in these meetings, who else spoke?

A There was no one, everybody spoke their ideas or opinions.

Q Did you speak your opinions?

A Yes.

Q Did you speak your opinion with respect to corporate contributions with respect to the George Bush for president committee?

A No.

Q When Mr. Rodriguez said that the George Bush

1
2 for president committee could not accept corporate checks,
3 was there any discussion about that?

4 A I don't remember anything specifically in
5 that moment.

6 Q But was there any discussion concerning that?

7 A Yes, it was discussed but I don't remember.

8 Q Was there a discussion about going back to
9 these corporations to have them make their checks out to
10 Ciudadanos Pro Democracia?

11 MR. GEIGEL: In which meeting are you
12 referring to?

13 MR. BOGIN: Any of these meetings.

14 THE WITNESS: This is why I asked a little
15 earlier, if I could clarify something because I
16 was a little confused.

17 BY MR. BOGIN:

18 Q Feel free, please go on.

19 A Once it was established that corporate checks
20 could not be accepted in the name of George Bush, in the
21 next meeting in a following meeting the idea of creating the
22 Ciudadanos Pro Democracia came up, was created.

23 Q Do you remember whose idea it was?

24 A No, I don't remember.

25 Q How does an idea get adopted by a meeting?

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A When no one opposes it and everyone says yes, it is a unanimous agreement.

Q What you are saying is if somebody says an idea, nobody opposes it and it goes through, then?

A In an informal meeting that is the way it is done.

Q But even most meetings have some direction, didn't Mrs. Vincenti recognize people to speak?

A I don't know.

Q When Mrs. Vincenti spoke, people listened?

A Yes.

Q Did she have the respect of the people at the committee, as far as running the George Bush for president campaign is concerned?

A Yes.

Q Do you have anything that you would like to say, anymore clarifications?

A No.

Q Did you have anything to do with getting money orders for the George Bush for president committee?

A Yes.

Q Could you tell us what your involvement was?

A When it was decided that a group of persons whom I did not know who they were, would go to the corporations

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2 they ask that the checks be made out to the Ciudadanos Pro
3 Democracia. A person at the meeting said, since we were
4 doing the work, why wouldn't the check be made out to us, as
5 sort of a recognition for the work done.

6 Q When you say "us" do you mean the committee,
7 Ciudadanos Pro Democracia?

8 A Yes, yes, the committee, the complete group.

9 Q What does this have to do with the money orders?

10 A Then it was decided to send them to the
11 campaign for George Bush.

12 Q What was your involvement in preparing the
13 money orders?

14 A None, I signed one. The checks were
15 deposited into the account of Ciudadanos Pro Democracia, once
16 they were received in that name, they had to be deposited
17 into that account and then they had to be taken out and this
18 is where I came in, I had to sign, to remove the money, to
19 withdraw the money from the account.

20 Q You were signatory on the account?

21 A Yes.

22 Q It is my understanding that checks did not get
23 deposited, though, they got cashed and did you have to sign
24 them to cash checks to Ciudadanos Pro Democracia?

25 A No.

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Q They got put into the account?

A Yes, they were deposited.

Q And then withdrawn?

A Yes.

Q And then money orders were made out?

A Yes.

Q So did you buy the money orders?

A No.

Q Did you give the cash to somebody else?

A I signed withdrawal slips and someone, I don't know who, withdrew the money .

Q Who did you give the withdrawal slips to?

A In a meeting.

Q You must have given it to somebody.

A Yes, to Doña Julia.

Q To summarize, at a meeting it was decided that checks written out by corporations to Ciudadanos Pro Democracia should be translated or transformed into money orders, is that true or not?

A The check came, they were deposited in that account then they were taken out.

Q Where did the checks come?

A At some time.

Q All at one time?

1

2

A I don't remember exactly.

3

Q Did you deposit the checks as they came in?

4

A I personally did not but they were deposited

5

in the account.

6

Q How did they get deposited into the account

7

if you did not do it?

8

A Someone, I don't know who, because I don't

9

have to be the one to deposit them.

10

Q But to withdraw money from the account, you

11

had to sign it?

12

A Yes.

13

Q And how many times did you have to sign

14

different checks to get money orders?

15

A I signed on one or two occasions but exactly

16

I don't remember.

17

Q And when you took a withdrawal, you got the

18

cash?

19

A The person who withdrew the money but in this

20

case the money orders were made.

21

Q So, you withdrew money from the account and

22

got money orders and gave them to Mrs. Vincenti.

23

A I did not.

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Q But you would sign the withdrawal slips and

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give it to Mrs. Vincenti?

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A Yes.

Q And then what happened, do you know?

A At a meeting they were distributed and different people signed them.

Q Did you sign one of them?

A Yes.

Q Do you remember for how much?

A For \$250.

Q Did you fill a card out, a contributor's card?

A Yes.

Q What did you have to fill out on that card?

A Some information that they required.

Q Was some of the information saying that you made a contribution to the George Bush for president committee?

A That at that moment I was making a contribution.

Q But it was not your money that you were making the contribution with?

A No, it was not.

Q It was not your money?

A No.

Q Did you question the fact that you were making a contribution with somebody else's money?

1
2 A No, because here that can be done, in Puerto
3 Rico that can be done.

4 Q Getting back to when you signed the withdrawal
5 slip to take money out of the account, you gave that
6 withdrawal slip to Mrs. Vincenti, do you know who went and
7 withdrew that money?

8 A No, I don't know.

9 Q But you gave it to Mrs. Vincenti?

10 A Yes.

11 Q Did she ask you that you should give her the
12 withdrawal slip?

13 A No, I just signed it.

14 Q Who directed you to sign the withdrawal slip?

15 A I don't remember, if it was her or someone
16 else, I don't remember but they gave me the paper and I
17 signed it.

18 Q Then you gave it back to Mrs. Vincenti?

19 A I gave it to her.

20 Q At the meeting were you given a money order to
21 sign, to say that it was a contribution from you, to sign?

22 A Yes.

23 Q Who gave you the money order?

24 A I think it was Doña Julia but I cannot say
25 because I don't remember exactly.

1
2 Q How many money orders were given out at this
3 meeting where you signed yours?

4 A I don't remember.

5 Q More than one?

6 A Yes.

7 Q More than four?

8 A I don't remember exactly.

9 Q Generally, approximately?

10 A It could be six, seven.

11 Q When did you find out that that contribution
12 to the George Bush for president committee could not be
13 accepted?

14 MR. GEIGEL: Which contribution are you
15 talking about?

16 MR. BOGIN: The money order, the \$250.

17 THE WITNESS: When I received a letter from
18 the George Bush committee telling me so.

19 BY MR. BOGIN:

20 Q Were you surprised to get the letter?

21 A Yes.

22 Q Did they return \$250 to you?

23 A No.

24 Q Do you know what happened to that \$250?

25 A No.

1
2 Q Has anybody else questioned you about this
3 matter, besides me?

4 A No.

5 Q You have never discussed this matter with
6 anyone besides me, before today?

7 A Yes, with Polly because she was extremely
8 worried.

9 Q With Polly Alemany?

10 A Yes.

11 Q With Mrs. Vincenti?

12 A Yes.

13 Q Who else?

14 A As far as I remember, no one else.

15 Q Jeb Bush?

16 A No.

17 Q Robert Visser?

18 A I don't know him.

19 MR. BOGIN: I have no more questions. Would
20 you like to cross-examine?

21 MR. GEIGEL: No, I have no questions.

22 MR. BOGIN: I would like to thank you very
23 much for coming and taking a break for your day.
24 You were very helpful.

25 MR. GEIGEL: Let me just ask one question.

1
2 Is your job at the hospital permanent or are you
3 placed there at the whim of the executive
4 director or the director of the State Insurance
5 Fund?

6 THE WITNESS: It is a permanent position.

7 MR. BOGIN: Thank you very much.

8 (Whereupon, at 4:15 p.m. the deposition was
9 terminated.)
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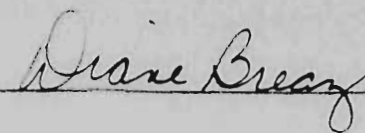
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REPORTER'S CERTIFICATE

I, DIANE BREAZ, Registered Professional Reporter
with the National Shorthand Reporters' Association;

DO HEREBY CERTIFY that the foregoing transcript
is a full, true and correct record which was taken down by
machine shorthand by me and thereafter reduced to
typewriting under my direction.

I FURTHER CERTIFY that I am in no way interested
in the outcome of the cause named in said caption.



CERTIFICATE OF NOTARY PUBLIC

I, RAFAEL GEIGEL-VASSALLO, duly commissioned and qualified in and for the Commonwealth of Puerto Rico, DO HEREBY CERTIFY that the foregoing deposition was taken before me acting as notary on the date and time heretofore mentioned;

That the reporter and the deponent were sworn before the commencement of the taking of the deponent's testimony;

IN WITNESS WHEREOF, I sign these presents and affix my notarial seal in San Juan, Puerto Rico this

14 day of April, 1980.

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[Handwritten signature]
NOTARY PUBLIC

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DEPOSITION OF:

JULIA RIVERA DE VINCENTI

March 19, 1980

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1 APPEARANCES:

2 ROBERT I. BOGIN, ESQ.
3 HAL PONDER, ESQ.
4 Federal Elections Commission
5 1325 K Street
6 Washington, D.C.

7 CHARLES S. FAX, ESQ.
8 RAFAEL GEIGEL-VASSALLO, ESQ.
9 Pan Am Building - Suite 504
10 Hato Rey, Puerto Rico
11 Attorneys for Julia Rivera De Vincenti, Rafael Fuentes and
12 Polly Alemany
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2 MR. FAX: I am Charles Fax, counsel for

3 Doña De Vincenti. When we were about to begin

4 the deposition this morning, we were advised by

5 the reporter that she, not being an attorney, was

6 not authorized within the Commonwealth of

7 Puerto Rico to administer the oath to the witness.

8 We have attempted to obtain the services of

9 a licensed notary within this building and have

10 been unable to do so. Mr. Rafael Geigel who is

11 an associate in our firm and who represents

12 Mrs. De Vincenti, is a licensed notary.

13 In order to proceed with this deposition, we

14 are prepared to permit the witness to be sworn by

15 Mr. Geigel. If you have no objections.

16 MR. BOGIN: There is no objection to that.

17 MR. FAX: You are certain of that?

18 MR. BOGIN: Yes.

19 MR. FAX: In that event, Rafael, why don't

20 you do it.

21 (The deponent and the reporter were duly sworn.)

22 MR. FAX: Counsel has stipulated that

23 Mr. Geigel will swear the reporter also. Before

24 we begin the deposition, I would like to make a

25 statement on behalf of Doña Julia De Vincenti.

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2 As I think we call know, she has been in
3 public service to the Commonwealth of Puerto Rico
4 for all of her adult life. She currently served
5 as administrator of the State Insurance Fund.
6 Appointed by governor of the Commonwealth of
7 Puerto Rico and sits in his cabinet, also.

8 She has been a professor of Sociology at the
9 University of Puerto Rico. She served with the
10 Secretary of Labor and in addition, was appointed
11 by President Nixon and served as alternate delegate
12 to the United Nations on behalf of the United
13 States.

14 At the same time that she has been in
15 Puerto Rico, she has given service in Puerto Rico
16 politics all of her adult life and this year was
17 her first exposure to national politics.

18 This marks the first involvement on the
19 part of Puerto Rico as a whole in Puerto Rican
20 national politics. That is, Puerto Rico did not
21 vote in national elections and this was the first
22 year of a national primary, or rather a primary
23 for a national election was held in Puerto Rico.

24 I submit that it is natural that Doña Julia
25 and others like her, who were involved for the

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2 first time in national politics this year in
3 Puerto Rico, would apply their experience in
4 Commonwealth politics to their first experience
5 in national politics.

6 It was consistent with that that she carried
7 out her responsibilities during the recent
8 primaries. When she was first informed that there
9 may have been irregularities or illegalities with
10 respect to activities which she participated in
11 and supervised, during the recent primary, her only
12 interest was in cooperating with whatever inquiry
13 might occur.

14 She has been forthcoming and fully cooperative
15 and will continue to be so. She was advised and
16 has been advised of the nature of this investigation
17 that is being conducted today. She has been
18 advised of the possible consequences of this
19 investigation and she has been advised of her
20 Constitutional rights, including the right not to
21 testify in the event that it might incriminate her.

22 Taking all of this advice into consideration,
23 Doña Julia determined at the outset and has never
24 waived from that, that she wanted to explain what
25 was done and why it was done, notwithstanding the

potential importance of her testimony.

I have nothing further.

MR. BOGIN: This deposition is taken at the behest of the Federal Elections Commission in connection with a matter under review number 1181.

Whereupon,

JULIA RIVERA DE VINCENTI

was called as a witness and after first having been duly sworn by the notary public, was examined and testified as follows:

EXAMINATION

BY MR. BOGIN:

Q Could you please tell us your name, your full name.

A Julia Rivera De Vincenti.

Q Should I call you Mrs. De Vincenti?

A Any way.

Q Where do you live?

A 762 Lopez Sigardo Avenue, Dos Piñones, Rio Piedras.

Q Mr. Fax has just stated that you are the administrator of the State Insurance Fund?

A Yes, since February, 1977.

Q Okay. I understand that you have been involved

1
2 in recently in the primary elections, Republican Primary
3 Election, what was your position in the last couple of months
4 with respect to that election?

5 A Well, in the last couple of months I was not
6 no longer the campaign chairman.

7 Q When were you first campaign chairman?

8 A Some time in the middle of 1977. I am sorry,
9 '79.

10 Q For which candidate?

11 A George Bush.

12 Q Middle of '79. Would you say June or July
13 of 1979?

14 A Yes. Actually I was first approached early
15 in 1979 but nothing else was said and perhaps around the
16 middle of, it would be early June or May, somewhere around
17 there, I was formerly asked to head the campaign and I
18 accepted.

19 Q Who approached you or who asked you to head
20 the campaign?

21 A I got a letter from Mr. George Bush asking me
22 to head the campaign.

23 Q And do you know why he asked you to head the
24 campaign?

25 MR. FAX: What he means by that is what

1
2 information do you have about that. You are not
3 asking her to speculate as to what was in
4 Mr. Bush's mind, right?

5 Just, do you have any information about why
6 he asked you.

7 THE WITNESS: About why he asked me?

8 BY MR. BOGIN:

9 Q Yes, why he asked you.

10 A I don't really know that I can answer that
11 question, other than the fact that he knew me and that we
12 had been working together at the United Nations.

13 Q He met you there?

14 A I had the honor of working with him when he
15 was ambassador and I was appointed at the U.S. Mission at
16 the United Nations.

17 Q Had you ever before this time worked in a
18 federal election, in any capacity?

19 A No, never.

20 Q And this was Puerto Rico's first presidential
21 primary?

22 A Absolutely. The first time that we had a
23 presidential primary in Puerto Rico.

24 Q When you were contacted in the middle of
25 1979, were you told what your responsibilities were going to

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1
2 be as campaign chairman?

3 MR. FAX: Do you mean when she was contacted
4 by letter by Mr. Bush?

5 MR. BOGIN: Or at any time.

6 BY MR. BOGIN:

7 Q When were you first told what you would be
8 doing as campaign chairman?

9 A Well, I don't know what specifically, if there
10 were any straight instructions. I presume and this is
11 presumption, that it was taken for granted that my having
12 been involved in politics in Puerto Rico for a long time,
13 that I knew what to do.

14 Q So you got a letter saying, "Would you please
15 be chairman for the George Bush for president committee in
16 Puerto Rico, state party chairman"?

17 A And then we were invited to go to Houston
18 to see the set up of the office and discuss campaign plans.
19 That visit was made around, I guess around the middle of
20 June.

21 Q So you went to Houston in the middle of June
22 to the George Bush for president headquarters in Houston,
23 Texas?

24 A Correct.

25 Q What did you learn there in Texas?

1
2 A Well, I had the opportunity of speaking to
3 a lot of people who were heading the campaign, Mr. Bush
4 himself was not there at the time. But there were people who
5 had, we were shown for example the rooms where they worked,
6 how they receive material, how they file it, how they
7 proceeded with different things.

8 We were handed a series or a set of books and
9 pamphlets to bring home.

10 Q And do you know what these pamphlets and
11 books were about?

12 A Honestly, I put them on top of my desk, I
13 don't remember going through them because we have much work
14 to do and so much stuff to read and this fine print just
15 sat there.

16 Q What other contacts after Houston did you
17 have with the national campaign, in terms of telling you
18 what your job was about?

19 A Well, we were getting constantly all these
20 releases that the office put out for all the different
21 state chairmans or campaign managers, explaining about how
22 the campaign was flowing, about the issues and the way or
23 where Mr. Bush stood on such and such an issue, about his
24 different schedules for visiting throughout the United
25 States. Occasionally we would get phone calls from

1
2 Houston either from the lady who was in charge of
3 Mr. Bush's calendar. We were trying to get him to come
4 down here and visit us and occasionally phone calls from
5 Jeb Bush, the son, who was going to work with us here.

6 Q Who else was on the committee, who were the
7 officials besides yourself on this Puerto Rico committee?

8 A It was a very large committee. A very
9 informal committee. I was the chairman, subsequently
10 Mr. Tony Rodriguez, an attorney, was selected or elected
11 president and there was a secretary and that was it. Because
12 as I say, it was an extremely informal group that kept
13 growing.

14 Q Who went to Texas with you?

15 A Mr. Rodriguez and Mrs. Alvita Granados.

16 Q And who is she?

17 A She was or is a very active republican young
18 lady who was working very closely with us and she works for
19 the Housing Development.

20 Q When you left Texas and came back to Puerto
21 Rico, what did you view your responsibilities as being at
22 that time, in terms of the George Bush for president committee?

23 A I viewed my responsibilities as organizing a
24 grass root movement to get people involved in participating
25 and in learning about these primaries, which to us were of

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2 the utmost importance because we were not thinking only in
3 terms of the primary, we were thinking in terms of our
4 ultimate goal which is statehood. And we saw these
5 primaries as an opportunity to start, for a start, in
6 national politics.

7 So that we were all very enthused about the
8 idea of helping to foster our idea and I saw myself, together
9 with the few people that I started with as a group that was
10 going to be very active politically, disseminating the idea
11 of statehood, primaries and participation in national
12 politics.

13 Q I am going to attempt chronologically to
14 find out what you were doing month by month in terms of the
15 George Bush campaign, after you left Texas.

16 To the best of your recollection, do you remember
17 what you did? I assume you got back in July?

18 A Yes.

19 Q What did you do the first month after you
20 came back from Texas in terms of organizing the committee
21 or whatever function that you were doing, what was that?

22 A Well, I used the same techniques that I
23 used in politics here. That is, I call up a few of your
24 very close friends who are your associates, get them
25 excited about something, in this case get them excited about

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2 the George Bush campaign for the primaries. Commit them to
3 in turn get other people excited, which is the way we work
4 it and then call a meeting where everybody says, "Okay, I
5 will be sure to bring ten people, five people, sixteen
6 people" so that during the issuing months we were meeting
7 and as I say the group continued to grow because since
8 everybody was thinking and they are statehooders, they are
9 thinking of a way to get in statehood. It was easy for
10 them to convince other people to join.

11 Q When did you have your first meeting through
12 this process that you are talking about?

13 A Frankly I could not tell you the exact date,
14 but it must have been early in July or perhaps the end of
15 July. July here is a month of many holidays.

16 MR. FAX: What is your recollection?

17 THE WITNESS: My recollection is that it was
18 the end of July.

19 BY MR. BOGIN:

20 Q How did you finance your activities up to this
21 point, in terms of -- there must have been some outlay of
22 money in making telephone calls and organizing and --

23 Do you have an office?

24 A No, we did it Puerto Rican style, that is,
25 if I tell you or if I ask you to get ten people for me, you

1
2 make the phone calls from your own home and pay for them
3 because we did not have an office. So that everybody who
4 tried to get people to come, took it upon themselves either
5 to invite them personally or by phone.

6 We did not have any kind of advertisement in
7 newspapers or radios or anything like that. So that the
8 money that was being spent, say for gas, in order to go to
9 maybe other towns because we did not stay in San Juan alone,
10 was paid by whoever took the car.

11 If I went in my own car, I paid for my own gas.
12 If somebody else went in his or her own car, they paid for
13 it.

14 At that point we did not have a single penny or
15 any budget to work with.

16 Q Did you ever contemplate having a fund raiser?

17 A Well, that idea, at that point again I repeat,
18 we had been told in June when we were in Houston that there
19 would be a budget for Puerto Rico. But at that point the
20 budget had not still been approved or worked out. If I
21 recall correctly, it was suggested in Houston at that time
22 or maybe later on that we have some kind of a fund raiser
23 because at that time also, say by the end of July, beginning
24 of August, we were already excited about the coming visit of
25 Mr. Bush to the island. Of course we knew that there would

1
2 be some expenses that we would have to incur in order to
3 promote the publicity and in order to give him a really good
4 welcome.

5 At that time it was suggested, if my recollection
6 is correct, that a fund raiser be carried on in order to get
7 funds for that particular activity.

8 Q Do you remember, to the best of your
9 recollection, how the decision was made to -- where the
10 decision was made to have the fund raiser and who was
11 involved with that decision?

12 MR. FAX: That is three questions.

13 BY MR. BOGIN:

14 Q To the best of your recollection what date
15 was the idea for a fund raiser proposed?

16 A The exact date I could not tell you. I am
17 still thinking it is about the end of maybe July.

18 Q Who was present?

19 A There were present about 30, 40 or 50 people.

20 Q At a meeting?

21 A At a meeting, yes, an open meeting which I
22 was -- I would like to state for the record that our meetings
23 were always open meetings. People came, people who were
24 interested came. We never met at any other time or any other
25 place than at these open meetings where people were sitting

1
2 and participating. There might have been 30, 40, 50 people
3 sitting there.

4 Q When was the date set?

5 A The date was set for September 12.

6 Q Any particular reason for that date?

7 A We had already been advised that Mr. Bush
8 would be here the 12th and the 13th. He was actually going
9 to come in the afternoon of the 12th and leave by ten o'clock
10 the next day, so that the only time we could possibly have
11 the affair and have him present would have been the 12th.

12 Q What kind of fund raiser was it going to be?

13 A A cocktail.

14 Q With Mr. Bush present?

15 A Yes.

16 Q How were the funds going to be raised?

17 A The idea came from the floor, following a
18 Puerto Rican tradition that tickets be sold in order to raise
19 money to pay for the expenses of the cocktail itself, plus
20 have some other money for activities or to give to the
21 George Bush for president committee.

22 Q And how much were these tickets, what was the
23 charge for these tickets?

24 A We had actually three kinds of charges. That
25 is, the people who were in the committee and could not afford

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1
2 a lot of money would pay \$10.

3 The people who could pay a little bit more, but
4 not too much, would pay \$25. The people who we felt we
5 could sell tickets to that they could really pay, were
6 sold for \$100. So that we had these three categories.

7 Q And how much money was raised from the fund
8 raiser?

9 MR. FAX: If you recall.

10 THE WITNESS: I don't recall the exact
11 amount.

12 BY MR. BOGIN:

13 Q Could you approximate to the best of your
14 recollection?

15 A To the best of my recollection probably
16 around, I don't know, 9,000, \$10,000. I am not definitely
17 sure. I don't swear to that.

18 Q Who was solicited to come to this fund raiser?

19 A I cannot tell you, I mean, because everybody
20 who was at the meetings as I say 40 or 50 people, said they
21 would sell tickets and naturally they had approached whoever
22 they approached and I don't know who they were. So that I
23 cannot -- I know that they told us that they would approach
24 their friends, anybody they thought was interested in
25 helping. Tickets were given there for people to take with

1
2 them to sell or buy for themselves. I really don't --
3 because at that time we did not have a finance chairman.

4 MR. FAX: Did you sell tickets to anybody?

5 THE WITNESS: I only sold three tickets.

6 One to my daughter and one to my brother and one
7 to myself. Those were the three tickets that I
8 sold.

9 BY MR. BOGIN:

10 Q When you got -- first of all, did all the
11 money come in in the form of a check for this fund raiser?

12 A I would say most came in in the form of a
13 check. Some came in in cash.

14 Q When the contribution came in cash, was there
15 any documentation that accompanied the cash?

16 A Usually they would send, say like a piece of
17 paper, somebody sold ten tickets, then a piece of paper would
18 come in with Juan Perez, \$10.

19 That money would be taken, inasmuch as somebody
20 mentioned the fact that you could not sell cash, then we
21 would consolidate that in one single draft or in one single
22 money order and send it to Houston with the names and
23 addresses of the donors.

24 Q Did the state committee have a bank account?

25 A No, we were told when we visited Houston, we

1
2 were told very specifically that in order to keep straight
3 records, Houston wanted to be the one spot to receive the
4 money and to pay.

5 We were not allowed to open any kind of bank
6 account and we never had a bank account.

7 Q So, when you got the money and you sent it
8 to Houston, within how many days of getting the money would
9 you do that?

10 A That I don't recall. I know that one of the
11 girls would have maybe six or seven individual checks of
12 25 or 10 or maybe \$100 and together with the cards they would
13 be sent to Houston.

14 But I don't know exactly how much time elapsed.

15 Q There would be a card accompanying the money
16 or the check?

17 A Yes.

18 Q And what was on that card?

19 A I don't know. We were getting through the
20 mail sort of a letter from Houston, from the headquarters
21 inviting people to join the campaign, together with an
22 envelope, pre-addressed envelope and a card, that when you
23 look at it, well, it gave you the impression that you were
24 going to fill out that card so that when Houston received
25 the money the office would know who was sending it.

1
2 MR. FAX: I want the record to be clear
3 that Mrs. Vincenti is being asked questions about
4 a procedure that occurred, that she apparently
5 supervised, where she herself did not send the
6 card in herself, so she cannot testify on her own
7 personal knowledge as to which of these events
8 occurred. So she is testifying with respect to
9 her supervision.

10 MR. PONDER: For the record, I think I
11 will interject here, that Mrs. Vincenti can make
12 that clarification herself because she is the
13 only one that can make that clear for the record.

14 MR. FAX: I think the clarification should be
15 in the record because I think a lay person can
16 easily misinterpret or misunderstand the question.

17 We always say, we do this or that, and we
18 mean when we say, "I", that it is "us", really.

19 MR. PONDER: We appreciate your bringing it
20 out. I am just saying that you should appreciate
21 that you cannot clarify the record for her, that
22 we will have to depend on her to do that.

23 MR. FAX: Maybe you can do that through your
24 questions, then. If you permit me, I can
25 ask her one or two clarifying questions.

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1
2 MR. BOGIN: Well, how about at the end.

3 MR. FAX: Let me say this, I don't need the
4 record to be clear for my purposes. But I want
5 you to understand what she is saying in the event
6 it is obscured.

7 MR. BOGIN: When I ask questions to the
8 best of your knowledge, and when you don't have
9 the exact knowledge or your personal knowledge,
10 then you should tell us that you don't but that
11 you have heard or try to explain the
12 derivation of your knowledge as best you can.

13 MR. FAX: Well, more specifically, did you
14 personally send in the money to Houston when it
15 was received in the office?

16 THE WITNESS: No.

17 MR. FAX: Somebody else did that at your
18 direction?

19 THE WITNESS: Yes.

20 MR. FAX: So you did not personally see
21 each time money was sent in?

22 THE WITNESS: No. I want to state for the
23 record that as the money came in, somebody in the
24 office took the money and sent it to Houston.

1
2 BY MR. BOGIN:

3 Q Who was that person?

4 A That person could have been and I say could
5 have been because all the girls in the office were helping,
6 I have three or four secretaries, so whoever might have
7 gotten the money could have sent it and I say it is not my
8 personal knowledge. I did not see when it was done but I
9 know it was done.

10 Q Secretaries at the State Insurance Fund?

11 A Yes.

12 Q You directed them to send in the money with the
13 card when you got them?

14 A Yes.

15 Q I would like to get back to the cocktail
16 party. Did the people come to the cocktail party and give
17 somebody the money there?

18 A Some. I believe a few people paid. May have
19 paid, let us put it that way, because again I did not have
20 anything to do with the money. Some of the people who
21 came there may have paid at the cocktail party. Most of
22 them either paid before or after.

23 Q Who did they pay? Did it come through the
24 mail?

25 A No. I don't believe, I will put it that way.

1
2 I don't know of any money that came through the mail.

3 Q Did the people deliver the money to you at
4 your office?

5 MR. FAX: Wait a second. We are running
6 into the same problem here. I don't want to
7 have to ask questions at the end.

8 It seems to me that it is appropriate to ask
9 her about things she personally saw. In a sense
10 you are asking her to speculate or generalize
11 answers about her entire course of conduct, which
12 she already testified she did not have specific
13 knowledge of each and every instance.

14 MR. BOGIN: Let me start with a new set of
15 direction.

16 BY MR. BOGIN:

17 Q You testified before that there was no
18 treasurer with the committee, is that true? There was no
19 treasurer?

20 A Let me explain that. There was a treasurer
21 elected in name, who was, who is a businessman here, who is
22 very difficult to get a hold of and who very seldom came to
23 the meetings.

24 Therefore if anybody came, I mean if any money
25 came in at the meeting itself somebody had to get hold of

1
2 that money since he was not there.

3 Q What is this individual's name?

4 A Ramirez de Arellano. He was the elected
5 treasurer. But as I said, he is a businessman from Ponce
6 and he is very active in a lot of things and because the
7 whole set up was so informal to the point that we did not
8 even keep minutes, like I said before --

9 Q So the treasurer was not available very often?

10 A Correct.

11 Q Who had the responsibility of sending any
12 money that came in, to Houston?

13 A Who had the responsibility? The responsibility
14 I presume should have been his but since he was not
15 available then if the money came, any one of the girls in
16 the office, as I said before, or at the meeting which is
17 when most of the money was brought in from one week to
18 another at the meeting, would take the money and send it to
19 Houston.

20 Q So these women at the State Insurance Fund
21 worked under your supervision and you directed them to send
22 the money into Houston when you got it?

23 A Well, I don't know that I directed them to
24 send the money. As I said it was a very informal situation
25 and if the money came they took it upon themselves, they

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1
2 carried that action out.

3 Q Was there ever any discussion with any of the
4 officials at the national committee for George Bush,
5 concerning any of the contributions that you got at this
6 fund raiser? Was there any problem with any of the
7 contributions that were sent to Houston?

8 MR. FAX: Are you referring specifically to
9 anything?

10 MR. BOGIN: To the fund raiser.

11 MR. FAX: The corporate checks?

12 MR. BOGIN: Any other problems.

13 THE WITNESS: We only had one fund raiser,
14 September 12, that is it. The money we got was
15 from that fund raiser.

16 BY MR. BOGIN:

17 Q And did that money get sent to Houston?

18 A That money originally as I say, came to our
19 meetings, at some point when we started getting a few checks
20 that belonged or were issued by corporations, Mr. Tony
21 Rodriguez was at one of the meetings when some of the checks
22 came in and then he immediately advised us that we could not
23 accept corporate money.

24 Q Who was Mr. Rodriguez?

25 A Mr. Rodriguez was the president of the

1
2 committee, who again was very seldom able to come to the
3 meetings because he is an attorney for Valdes and
4 McConnell who travels a lot.

5 Q He said that you could not send those checks
6 to Houston?

7 A He said we could not accept any corporation
8 checks because it was against the law.

9 Q To the best of your knowledge were any of
10 these corporate checks sent to Houston?

11 A On that I am sure, they were never sent
12 because at that meeting when we were informed that we could
13 not accept corporate money, we took the checks which were
14 there and asked the people who had originally gotten the
15 money to please return it, inasmuch as we could not accept
16 them.

17 Q So Mr. Rodriguez told you that the committee
18 could not accept corporate checks?

19 A Yes.

20 Q And the committee returned these checks to the
21 contributors?

22 A Correct.

23 Q Okay. I would like to ask you some questions
24 about a committee called Ciudadanos Pro Democracia ,
25 what is that committee?

1
2 A Ciudadanos Pro Democracia was a group that
3 emerged spontaneously from this big meeting. Once we were
4 told that we could not accept corporation money, it came as
5 part of the whole Puerto Rican phenomenon of politics.

6 MR. FAX: Was Mr. Rodriguez at that meeting
7 that you are talking about?

8 THE WITNESS: No, it is a separate meeting.

9 BY MR. BOGIN:

10 Q Do you remember roughly what date this was?
11 Was this after the fund raiser?

12 A It was before because we were already getting
13 the checks in before the fund raiser took place.

14 Q Was it after Mr. Rodriguez said that the
15 committee could not accept corporate checks?

16 A It was not at the same meeting. That meeting
17 was held, we identified the checks, who sold this ticket
18 and who sold that ticket and returned the checks.

19 The meeting was dismissed. So it must have been
20 at the next meeting that we again found ourselves in a
21 position where we wanted to carry on certain activities and
22 we had no way of financing them.

23 Now I want to take a few minutes to explain this
24 business of how the committee came about, because in order
25 to understand the committee and its functions and existence

1
2 and goals, you have to understand how we work here
3 politically.

4 In Puerto Rico it is usual to have three or four
5 committees within the same committee. Particularly for the
6 purpose of fund raising. Since we are not required by law
7 to incorporate such a committee, or to file papers anywhere,
8 usually what happens is that at a meeting somebody from
9 the floor says, "Why don't we organize one such committee."

10 In this case the meeting was held, somebody
11 from the floor said, "Why don't we organize a committee
12 called Ciudadanos Pro Democracia, in order to be able to
13 do two things, raise money for George Bush and at the
14 same time get money to educate, to carry through the idea
15 of statehood, primaries and Republican parties".

16 We thought it was a very good idea because we
17 were following whatever is done here. It was not a question
18 of getting a new set up, it was not a question of electing
19 officers or anything like that. It was just a committee
20 that was formed. Everybody said fine. I myself accepted
21 the idea because I have seen it done here in politics,
22 where our main purpose, all the people that were meeting
23 there, all throughout, are the people who are above
24 everything, statehooders.

25 We saw this as a vehicle for carrying to our

1
2 people the idea of statehood. We knew we had to have a
3 very intense educational program because it was the first
4 time that Puerto Rico participated in a presidential
5 primary, because we knew people could not understand how
6 you could be a member of the New Progressive Party, a
7 member of the Republican Party, and half of our people in
8 the New Progressive Party, members of the Republican Party.

9 Q Were you present at the meeting when the
10 idea for this committee of Ciudadanos Pro Democracia was
11 evolved?

12 A Yes.

13 Q Do you remember whose idea it was?

14 A Frankly I don't because as I say they are
15 very informal and somebody from the floor threw the idea.
16 I don't really recall whose idea it was.

17 Q Was a bank account opened for this committee?

18 A Yes.

19 Q And who opened that account?

20 A The bank account was opened by two people who
21 were at the meeting. One is Ms. Polly Alemany and
22 Rafi Fuentes.

23 Q And I am curious now about how the money
24 came to this committee. After the committee decided to
25 start this other committee, this Ciudadanos Pro Democracia,

1
2 could you tell us who was to be solicited to contribute to
3 this committee?

4 A Again, that was an idea sprung from the floor.
5 Somebody said, "If these people that gave us money for
6 the banquet gave it to us before, they would give it to us
7 again", but there was no solicitation as made.

8 Q A banquet?

9 A No, the cocktail party. Somebody said from
10 the floor,"since we returned the money for the tickets,
11 why don't we go back and ask them to donate money for
12 Citizens for Democracy, that we see fit to use it for"
13 That is, some for education on the primary and et cetera
14 and again somebody said, "It is a wonderful idea."

15 A All the money that was brought in for
16 Ciudadanos Pro Democracia, all of it, how much of that money
17 went to George Bush, to the best of your knowledge?

18 MR. FAX: If you know.

19 BY MR. BOGIN:

20 Q Did all of it go to George Bush?

21 A I don't know exactly the money placed in the
22 bank account. We accounted for money used for mailing,
23 \$300 and we accounted for \$300 used for refreshments and
24 food and there was \$157 or 152 --

25 MR. FAX: Was that the money that Jeb Bush

1
2 was given?

3 THE WITNESS: That Jeb Bush was given.

4 BY MR. BOGIN:

5 Q Was any of the money that was raised for
6 Ciudadanos Pro Democracia used for other than George Bush?

7 A It might have been.

8 Q But you don't know?

9 A I don't know.

10 Q So we have a situation here where
11 Mr. Rodriguez, at one meeting said that the committee
12 could not accept corporation checks and --

13 MR. FAX: The George Bush committee.

14 MR. BOGIN: Yes, the George Bush committee
15 could not accept corporate checks.

16 THE WITNESS: That is true.

17 BY MR. BOGIN:

18 Q Then we have a subsequent meeting where an
19 idea evolved for another committee, not the George Bush
20 for president committee, that could accept corporate checks?

21 A Well, we shouldn't put it that way. The
22 idea was that nobody thought it was wrong to accept
23 corporate checks because we were dealing with Puerto Rico
24 politics. We were organizing a Puerto Rican group or
25 committee and here in Puerto Rico there is no law forbidding

1
2 contributions from corporations.

3 Q Mrs. Hilda Julia and Rios Slavins, do you
4 know them?

5 A I don't know them.

6 Q Do you know of them?

7 A I know of them but I don't know them.

8 Q What do you know of them? Do they own
9 corporations?

10 A Yes, they own several corporations.
11 Mr. Slavins is here, I think he is the Honorary Consul
12 from Peru or for Peru and his name is often in the news-
13 papers but I know they own several corporations.

14 Q They are from Puerto Rico?

15 A Yes.

16 Q Do you know whether or not they contributed,
17 their corporation contributed to Ciudadanos Pro Democracia?

18 A Personally, I do not.

19 MR. FAX: You did not solicit the money?

20 THE WITNESS: I did not solicit the money.

21 But I saw the checks.

22 BY MR. BOGIN:

23 Q Do you know who solicited them?

24 A That much I don't know.

25 Q So you don't know how they knew about

1
2 Ciudadanos Pro Democracia?

3 A Exactly.

4 MR. FAX: Presumably.

5 THE WITNESS: It must have been somebody at
6 the meeting.

7 MR. PONDER: Excuse me. I would like to let
8 Mrs. De Vincenti answer the question, rather than
9 you helping her answer them.

10 MR. FAX: I am trying to assist in answering
11 some of the questions, in asking some of the
12 questions.

13 MR. PONDER: Before when you suggested to her
14 that she did not solicit the money. I would
15 rather you let her finish the answer and then if
16 you would like to ask a question later, fine.

17 THE WITNESS: I had already stated before that
18 I did not solicit anything. I sold three tickets
19 to my own family.

20 MR. PONDER: This has nothing to do with you
21 Mrs. Vincenti. We are talking about a procedural
22 problem.

23 BY MR. BOGIN:

24 Q You do not know how Slavin or Julia, in
25 their corporate capacity was able to make a contribution to

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Ciudadanos Pro Decmocracia?

A I don't know personally.

Q But you saw the check?

A I saw the checks.

Q Who showed you the checks?

A They were there with a few of the checks that came in.

Q They came in through the mail?

A They were given at the meetings.

Q And handed to you?

A Placed on a table.

Q Then what happened to these checks or this check that were written out, were they written out to Ciudadanos Pro Democracia?

A Yes, sir.

Q Then, after you saw the checks, what happened to them? Do you know what happened to these checks?

A Then when the checks were there at a general meeting, the idea came up that inasmuch as the money had been solicited for George Bush and for purposes for education, we should send the money to the George Bush for president committee. Again it was a thought that came up in the meeting.

Q Okay. So did you then send that check over

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to George Bush for president committee?

A Oh no, those checks were never sent to him as such.

Q What happened with those checks?

A Again I have to come back to Puerto Rican politics.

Q Instead of getting back to that, I would like to follow through with this line of thought.

A It is within what I am trying to say. The fact that we had gotten money which was not either marked specifically for anything, could be used as we saw fit, even though the explanations given when the checks were returned should have been and I say should have been, because I wasn't present when they were given, that we could not accept corporate money.

Somebody from the floor said, "Why don't we take these checks and make out either money orders or cashier's checks and send them in our different names to the George Bush for president committee."

That idea came from the floor and everybody immediately raised their hands and said, "Sure, I will sign. I will sign."

Q So all these corporate checks were changed to money orders?

1
2 A All those that were there at the time were
3 changed to money orders.

4 Q And then sent to the George Bush for
5 president committee?

6 A Yes.

7 Q With a contributor card?

8 A Whoever signed the money order would send the
9 contributor's card.

10 Q And those contributor cards were people that
11 were present at those meetings?

12 A Right.

13 Q Nobody else?

14 A Nobody else.

15 Q Did anybody question the fact that since
16 George Bush for president committee could not accept
17 corporate checks in the first place, that this procedure
18 was all right?

19 A Nobody questioned the fact because as I
20 said, we were going under the same assumption that what was
21 being done is correct. We get money for X committee and
22 they say you can do as you please with that money, then we
23 can either apportion it and use some for propaganda, for
24 one person, nobody, absolutely. There was absolutely no
25 intention, no malice going behind or under the law.

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2 We simply reacted normally the way we would react
3 if it had been a meeting for a group of strict Puerto Rican
4 politics. The money was not earmarked in any fashion, so
5 we could use it as we saw fit.

6 Q Before you said that the checks were not
7 earmarked as you were to use for any purpose. Do you know
8 what the corporations were told about what would happen with
9 their money?

10 A Well, I don't know personally because as I
11 said, I did not hand any of the checks back but at that
12 meeting we gave specific instructions to the fact that when
13 the money was returned people would be explained why we were
14 returning the money.

15 In the subsequent meetings when somebody suggested
16 that we get money for Ciudadanos Pro Democracia, we also
17 made it very clear that we would be getting money to be
18 used for three main purposes. To help George Bush campaign,
19 to help the Republican Party campaign and primarily to help
20 the primaries, our educational effort for the primaries
21 and participation of the Puerto Rican public in the primaries.

22 Q Were there three purposes for Ciudadanos
23 Pro Democracia?

24 A Yes.

25 Q One for George Bush, one for the purpose of

1
2 statehood and one for the primaries?

3 A The last two were entwined.

4 Q But you don't know who the corporations were
5 told, but this was the idea of the committee?

6 A I cannot vouch as to what they were told.

7 Q When did you learn for the first time that
8 the money orders that were sent to Texas could not be
9 accepted by them?

10 A I am not sure of the exact date but I believe
11 it must have been perhaps the end of November that I called
12 or early in December. It must have been the last part of
13 November because Jeb was here on the 6th. I got a call
14 from Jeb Bush from Houston, telling us that the money they
15 had received could not be accepted and mentioning
16 Mrs. Julia's letter and he said, "Please close the account
17 and I will try to get in touch with you to settle this
18 whole situation."

19 We had three or four conversations over the
20 telephone but it was a little bit difficult getting it
21 across, that he decided to come to Puerto Rico to clear it
22 up.

23 At that point we immediately closed the account
24 and we did not bother to try to get any more money, except
25 concentrate on the upcoming visit of the candidate which was

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1
2 December 21.

3 Q To jump ahead, did you receive at the end
4 of January a letter from Roberto Visser, General Counsel to
5 the George Bush committee, a copy of a letter that was sent
6 to George M. Steal?

7 A Yes, sir.

8 Q Have you read that letter?

9 A Yes, sir.

10 Q Do you agree with any statements in that
11 letter, that refers to your activities therein?

12 MR. FAX: I don't want to interrupt but maybe
13 you can take her through the letter.

14 BY MR. BOGIN:

15 Q I would just like you to address yourself to
16 any part of that letter. Do you disagree with any part of
17 that letter that you read?

18 A Right off the bat, it is a little bit
19 difficult, because it was rather a long letter.

20 Q Okay. That is enough for my purposes.
21 Was there any reason that you know of that the George Bush
22 for president committee itself in Texas would know that
23 these contributions that were received by Ciudadanos Pro
24 Democracia, were corporate contributions other than they
25 found out through the Julia letter?

1
2 A Naturally I cannot answer for them but I do
3 know that when they got the Julia letter, then they wanted
4 to know, they asked me personally, Jeb Bush asked me
5 personally "Were there other checks sent by corporations
6 that were forwarded under another name to Houston" and I
7 went through a list that he provided, a computer list that he
8 provided and between a few of the members of the committee,
9 to the best of our ability, we went through each and every
10 one and picked out those that we felt were people who had
11 sent the checks for Ciudadanos Pro Democracia.

12 Because I want to state for the record that actually
13 no check was ever sent, marked Ciudadanos Pro Democracia
14 was never sent to the George Bush for president committee.

15 MR. BOGIN: I would like to take a five minute
16 break.

17 (There was a 30 minute recess taken.)

18 BY MR. BOGIN:

19 Q We are back on the record now.

20 Mrs. De Vincenti, I would like to bring you back
21 again to your Houston trip, when you went to Texas. Do you
22 remember who you talked with in Houston? Did you speak to
23 any Bush official down there?

24 A Somebody by the name of Bush?

25 Q No, any official for the George Bush committee?

1

2

A I presume.

3

Q Do you remember who, by name?

4

5

A If I remember correctly, Mr. Baker wasn't in Houston at the time. He was, I believe, the campaign manager.

6

7

Q He was not in Houston?

8

9

A He was not in Houston. I really don't recall any names. As I say, I was taken around. I am very bad on names.

10

11

Q How long were you in Houston for?

12

13

A We were there for about maybe four or five hours.

14

Q And what was the purpose of going to Houston?

15

16

A The purpose was to know the facilities, to meet the people that were in charge of the campaign and I guess to get a feel of the whole situation because as I say it was our very first involvement in national politics.

17

18

We had no idea how politics were carried on in the states.

19

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Q Was there any explanation of the Federal Elections Campaign Act?

21

22

A I don't recall. As I said, I know we got a lot of books.

23

24

Q Was there any discussions concerning the

25

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1
2 reporting and filing, the reporting of contributors to the
3 campaign?

4 A I don't recall.

5 Q Was there any discussions concerning how
6 the contributions were to be sent to the campain?

7 A Really, I cannot recall.

8 Q Earlier you told us that you knew you could
9 not open a bank account.

10 A That I was specifically told by Jeb Bush.

11 Q In Texas?

12 A Yes, I believe in Texas.

13 Q So did you speak to Jeb Bush in Texas when you
14 were down there?

15 A I must have. Now come to think of it, I am
16 not too sure.

17 Q Just take your time and try to remember.

18 A I am trying to think because I really cannot
19 definitely remember whether he was there or not.

20 Q Was it Jeb Bush who told you that you should
21 not open a bank account in Puerto Rico?

22 A Yes, but I think, I am not sure at this point
23 whether I got that information in Texas or whether I got that
24 information through the phone or on a subsequent conversation
25 with Jeb. But I remember very definitely being told that our

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2 accounts would be carried on in Texas. If there were any
3 expenses involved, that we should send our bills to Texas
4 because they wanted to have absolute control of all the
5 finances. That much I can remember. But honestly I can't
6 remember if that was told at the time or in a subsequent
7 conversation.

8 Q Was there anybody else in Texas, from any
9 other state campaign committee, other than yourself?

10 A At the time, only ourselves. I believe that
11 I mentioned before that we had to make a special trip
12 because I learned from reading something that there might have
13 been a meeting before of state because of the distance
14 and so forth, we did not attend that meeting. That is why
15 we went later to visit.

16 Q Was there ever any discussions in Houston,
17 in Texas, concerning distributor cards to company
18 contributions?

19 A I don't remember that there was. I do
20 remember that we were told to get a finance chairman, which
21 we tried with no luck.

22 Q Is a finance chairman different than a
23 treasurer?

24 A In our way of thinking, yes.

25 Q Did you already have a treasurer at this time

1
2 when you were in Houston?

3 A No, we did not.

4 Q You got a treasurer after the Houston trip?

5 A Right.

6 Q And that individual's name is Mr. Rodriguez?

7 A No, that is Mr. Ramirez de Arellano.

8 Q How did you know what you were supposed to
9 do with contributions when the committee received them?

10 A As I explained before, we had been getting
11 all sorts of letters, not only from the Bush campaign but
12 from all other candidates. Where there was information
13 about the candidate a pre-addressed envelope and a card
14 to accompany the contribution and I guess we just learned
15 that was the way to do it.

16 Q So you don't know exactly how you came about
17 the knowledge that every time a contribution was sent to
18 Texas that it had to be accompanied by a contribution card?

19 A To my best recollection that sort of was the
20 knowledge that we got from receiving this information. But
21 again I cannot vouch for the fact that I was or was not told.

22 Q I want to know now about the meeting when
23 the people, who are at the meeting, said that they would allow
24 their names to be used as contributors in that card.

25 When was that meeting? Is that the same meeting

1
2 that the Ciudadanos Pro Democracia was formed or is that a
3 subsequent meeting?

4 A I believe it must have been a subsequent
5 meeting.

6 Q And did the people who said that they would
7 fill out these cards, fill out cards?

8 A Let me come back. We had this idea for
9 Ciudadanos Pro Democracia and once the committee was born,
10 again from the floor somebody said, "We can send the money
11 there" and I believe it was at the same meeting that people
12 said, or volunteered to sign or to fill out whatever was
13 necessary to be sent.

14 The people volunteered, they signed themselves,
15 nobody signed for anybody else.

16 Q Did you fill out the information on those
17 cards?

18 A I don't recall that I did.

19 Q People signed these cards saying that they
20 paid a contribution but it was really the money from the
21 corporations that was sent?

22 A Well, I wouldn't say it was the money from
23 the corporations issued to George Bush, it was the money
24 given to Ciudadanos Pro Democracia for whatever use we
25 wanted. We returned all the checks from the corporations,

1
2 they were returned to their original donors. It was
3 afterwards, as I say, when the meeting came about and people
4 said, "Let's go back and see if they want to contribute
5 now for Ciudadanos Pro Democracia" and that was the time
6 when the idea came about.

7 Q Do you remember what those contributor
8 cards, the information they wanted in them? Do you remember
9 what the information was that they wanted on those cards?

10 A Well, I remember there was a name, you had
11 to put your name on there and your address.

12 Q And did that name mean that you made the
13 contribution by putting your name there, was that the
14 person that was making the contribution?

15 MR. FAX: You mean is that what the card
16 said?

17 BY MR. BOGIN:

18 Q You were present when people volunteered
19 to put their names on these cards.

20 A I was present when people volunteered to sign
21 for the checks or for the money orders that would be issued
22 for the George Bush committee.

23 Q And after people volunteered to do that, were
24 they given contributor cards?

25 A Not at that same meeting because the idea

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came on, we still did not have the checks back.

Q The idea to fill in the contributor cards with individuals' names came before you actually received any checks? Let me start again from the beginning.

A At a meeting people said that they would volunteer to sign a contributor's card.

A People said that they would volunteer to sign at that time. We were talking about the possible checks that were going to be made out to George Bush for president committee. We still had no cards and we had no -- what do you call it -- no checks as yet.

Later on in a subsequent meeting the checks were gotten, I mean the bank checks were gotten and I presume, again I presume what people did was since they had already gotten letters from the committee, as did everybody else, asking for contributions, they already had the letters, they already had the cards.

Q Okay. I am still a little unclear about this. When did you become aware that there were checks, corporate checks written out to Ciudadanos Pro Democracia?

A When did I become aware of it?

MR. FAX: That checks had been written?

BY MR. BOGIN:

Q At one point you said you saw checks. The

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1
2 payee was Ciudadanos Pro Democracia?

3 A Right.

4 Q Do you recall when it was that you saw those
5 checks?

6 A Again, it must have been at one of the
7 meetings that the people started to bring back the checks
8 that they had gone and gotten from the people who originally
9 they had returned the checks to. Some never went back.

10 Q I am going to go even further back. At
11 one point you had a check written to George Bush, there were
12 checks for George Bush for president committee written on
13 checks.

14 A Yes.

15 Q Mr. Rodriguez said that the committee could
16 not accept these checks.

17 A Right.

18 Q The people who got these checks returned them
19 to the corporations.

20 A Correct.

21 Q Then, did the corporation then make out checks
22 to Ciudadanos Pro Democracia?

23 MR. FAX: Wait a minute. She cannot testify
24 as to what somebody else did.

25 MR. BOGIN: Do you know whether or not after

1
2 those checks were returned that these corporations
3 then made out different checks?

4 MR. FAX: She said she saw the checks.

5 MR. BOGIN: But we also know that she knew
6 that they had been sent back to the corporations
7 originally and that they were asked to write out
8 another check.

9 MR. FAX: As far as she knows.

10 THE WITNESS: But let's get this clear. At
11 the time we sent back the checks, that was not the
12 meeting at which Ciudadanos Pro Democracia came into
13 being.

14 The checks were returned period. Afterwards
15 when the idea of Ciudadanos Pro Democracia came,
16 well as long as we returned the checks already, why
17 not go back and ask the different people to give us
18 money for Ciudadanos Pro Democracia?

19 BY MR. BOGIN:

20 Q Do you remember who that person was?

21 A How many went back and how many were returned,
22 I cannot tell you.

23 Q Then the committee, then you saw checks written
24 out to Ciudadanos Pro Democracia?

25 A Right.

1
2 Q Were there contribution cards with those
3 checks at the time you saw them?

4 A Remember, when these people asked for the
5 checks they were not asking originally, they were selling
6 tickets, they were not asking for any contributions.

7 Now, when Ciudadanos Pro Democracia came in, since
8 that was a local affair, I don 't recall any cards being
9 there because there was no reason for the cards being there.

10 Q Then at the time that you saw the checks
11 written out to Ciudadanos Pro Democracia from these
12 corporations, you did not see any contribution cards?

13 A I indicated that I did not see them because
14 the Ciudadanos Pro Democracia was not asked specifically for
15 one thing. There was no reason to have any cards there.

16 Q Then what happened to those corporate checks
17 written out to Ciudadanos Pro Democracia, to the best of
18 your knowledge? Do you know what happened to those checks?

19 A To the best of my knowledge they were
20 deposited at that account that was opened.

21 Q And do you know who deposited it in that
22 account?

23 A The people that opened that account, which
24 were two of the people that were present.

25 Q Those people were?

1
2 A Mr. Rafi Fuentes and Polly Alemany.

3 MR. FAX: Which ones are you referring to,
4 all of them or --

5 MR. BOGIN: Well, maybe we should get into
6 that.

7 BY MR. BOGIN:

8 Q The ones that were made into money orders,
9 do you know how the check that was made out to Ciudadanos
10 Pro Democracia, those checks which eventually became money
11 orders to the George Bush for president committee, who
12 actually, do you know who actually went and cashed them
13 into the bank and made them out to the money orders?

14 A I don't recall, really.

15 MR. FAX: Did you do it?

16 THE WITNESS: I did not do it.

17 MR. FAX: Did you go down to the bank on
18 any of these transations?

19 THE WITNESS: No. I wanted to state for the
20 record that I never went to the bank. I never
21 opened an account and I never deposited any of
22 those checks. I never had anything to do with
23 the checks as such.

24 BY MR. BOGIN:

25 Q Did you tell anyone to go to the bank with

1
2 these checks and cash them and make them into money orders?

3 A No. That was told as a whole in the
4 meeting.

5 Q And you don't recollect whose idea that was
6 at the meeting?

7 A The idea came and everybody said yes. "That
8 is a very good idea".

9 Q When were the contribution cards that
10 accompanied the money orders made out, if you know?

11 A I don 't know when they were made out.

12 Q Do you know Jose A. Vincenti?

13 A Yes, that is my husband.

14 Q Do you know if he filled out a contribution
15 card with one of the money orders?

16 A I presume he did.

17 Q Do you know who filled out the contribution
18 card that accompanied the money order that has his name on
19 it?

20 A I think he did it himself.

21 Q I am having difficulty with the contribution
22 cards and when they were made out.

23 A At the open meeting, somebody said, "Why
24 don't we sent this money in different names. The way we
25 do it here", and everybody said, "oh, that is a fine idea!"

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2 At that time we still did not have the bank
3 checks. At a subsequent meeting the checks came and the
4 people who were there signed for them.

5 Now, it stands to reason, but I cannot vouch
6 for it that the joining of the cards or the filling out of
7 the cards was done at the same time.

8 I do know that we said there very specifically
9 that any contribution that was sent to the George Bush for
10 president committee should be accompanied by a card.
11 So that people would, the people in the committee would know
12 where the contribution was coming from. That much, I know.
13 But I cannot vouch for the time and the specific place with
14 each card. Because people might not have signed all at the
15 same time.

16 Q You keep on saying that this is the way it is
17 done in Puerto Rico. Do they allow corporate contributions?

18 A Yes.

19 Q When a corporation makes a contribution, is
20 it on a corporate check?

21 MR. FAX: She cannot testify as to everytime
22 a corporation makes a contribution in Puerto Rico.
23 You mean has she seen that?

24 THE WITNESS: Yes. When we for example sell
25 tickets for an affair, to X corporation, we sell

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ten tickets.

BY MR. BOGIN:

Q Do you know to the best of your knowledge, if when a corporation makes a contribution, whether or not it is made in the name of an individual?

A That I don't know. That I could not vouch for because I have never been involved in fund raising affairs. Mine is strictly political.

Q Did it seem unusual to anybody that a corporation would make a contribution and then it would be made in the name of an individual and not in the corporation, to the George Bush for president committee?

A I am sorry, I did not get that.

Q I keep on hearing, "This is the way it is done in Puerto Rico." But what was done here apparently is that a corporate check was changed into a money order which was then contributed to George Bush for president committee.

Is that the way, to the best of your knowledge, is that the way it is done in Puerto Rico politics?

A To the best of my knowledge, once you get the money from a corporation or whatever, you do with that money whatever you deem best. To the best of my knowledge.

Q But is it unusual to convert, change the

1
2 corporate checks into a money order before contributing
3 that?

4 MR. FAX: She is not an expert on financing
5 political things in Puerto Rico. You mean in
6 her experience?

7 MR. BOGIN: Yes, in her experience.

8 MR. FAX: Let's go off the record.

9 (Discussion off the record.)

10 BY MR. BOGIN:

11 Q Who were the officials, if any, for
12 Ciudadanos Pro Democracia?

13 A We never elected any officials, the whole
14 group was the official.

15 Q And who was that group?

16 A The big group within the George Bush for
17 president committee.

18 Q So, Ciudadanos Pro Democracia were the same
19 people as George Bush for president committee?

20 A In a sense, whoever might have been there.

21 Q When the checks, when the checks were
22 written to Ciudadanos Pro Democracia, did those people
23 consider that money, money which they could then give to
24 George Bush for president committee?

25 A Basically they considered that that was money

1
2 that they could use as they saw fit. One of the purposes,
3 or one of the funnels could very well be George Bush for
4 president committee.

5 Q To the best of your knowledge, can you tell
6 me why the people who accepted these checks from Ciudadanos
7 Pro Democracia felt that they had to make it into a money
8 order before giving it to the George Bush for president
9 committee?

10 MR. FAX: Wait a second. You cannot ask her
11 to speculate on the motives of other people.
12 If you want to ask her about her motives, what
13 people said to her, what she heard, that is fine.

14 MR. BOGIN: I mean to the best of your
15 knowledge, anything that came out of those meetings.

16 MR. FAX: The way you ask the question, you
17 permit her to speculate. What the motives were
18 of other people, whether they were articulated
19 or what.

20 MR. BOGIN: With regard to any discussions
21 at any open meetings that you had, could you tell
22 us what was the reason why checks written to
23 Ciudadanos Pro Democracia from corporations had
24 to be made in the name of individuals?

25 THE WITNESS: As I say, I cannot answer for

1
2 what people thought. I can only tell you that
3 the usual customary thing here is to do things
4 like that. Before when the issue came on the floor
5 everybody was agreeable.

6 BY MR. BOGIN:

7 Q But in Puerto Rico they don't do that, you
8 said --

9 A They don't do that.

10 Q We have corporate checks being made out to
11 Ciudadanos Pro Democracia.

12 A Correct.

13 Q And then we have some of these checks being
14 converted into money orders, is that right?

15 A Correct.

16 Q And then we have these money orders being
17 sent over to George Bush for president committee, is that
18 right?

19 A Correct.

20 Q Can you tell me why, based on any knowledge
21 that you have from these open meetings, was the reason why
22 you had to do these steps in order to get those contributions
23 made?

24 A Well, I don't know of any other reason other
25 than the fact that that is what we do here all the time.

1
2 deposited into that account?

3 A That is correct.

4 Q What happened, instead of being deposited
5 into that account, what happened to those checks, If they
6 were not deposited into the account?

7 MR. FAX: I am sorry but she was not there.

8 (Discussion off the record.)

9 BY MR. BOGIN:

10 Q Maybe to put it more bluntly, do you, along
11 with the committee, decide to have the corporate checks
12 disguised as personal money orders in order not to be
13 in violation of the Federal Campaign Laws?

14 A No, I am not going to accept that I did
15 something that I did not do with the malice of going outside
16 of the law, no. That was a resolution or an acceptance
17 from everybody that we would open a savings account because
18 we figured that we were going to have a long campaign. As
19 I said, we wanted to go on further in statehood and primaries
20 and so forth, that by having a savings account we could
21 pick up interest on the savings not because we were trying to
22 disguise anything.

23 We were told no corporate money, that is it.

24 Q You knew before that corporate checks could
25 not be given to the Bush for president committee?

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2 A When I was advised that no corporate money
3 could be given, that was the time that we returned all the
4 checks.

5 Q Why did you think that you could make the
6 contributions to the George Bush for president committee
7 in the way that you did, if you knew that you could not make
8 them directly to the George Bush for president committee as
9 corporate contributions?

10 A The only explanation I can give and remember
11 that was not my idea, it was an idea from the floor --

12 Q Did it ever enter your mind that this wouldn't
13 be permissible?

14 A It never entered my mind that it would not be
15 permissible. As we said, we had gotten money for Citizens
16 for Democracy, which was not earmarked. We felt free that
17 we could dispose of that money for contributions the way
18 it is done here.

19 Q Do you know, when you were shown the computer
20 print out by some official, did you know --

21 A By Jeb Bush.

22 Q You were able to tell Mr. Bush which contributions
23 were made by corporations?

24 A The only way I was able to do it was because
25 I recognized the names of the people who had signed the

1
2 Citizens for Democracy bank checks, was the only way I could
3 do it. Otherwise I would not know.

4 Q Do you know, how were you able to tell that
5 Francisco Carvajal and Francisco Carrera and S. Luna made
6 contributions to the George Bush for president committee?

7 A Not to the George Bush for president.

8 Q For Ciudadanos Pro Democracia?

9 A Yes, to Ciudadanos Pro Democracia.

10 Q How did you know that they made that?

11 A It might have been, I don't recall exactly,
12 that there were some stubs around of the checks of Ciudadanos
13 Pro Democracia.

14 Q So when Jeb showed you the computer list,
15 and you saw these people, you said they did not make a
16 contribution to George Bush but to Ciudadanos Pro Democracia?

17 A It is possible that I did.

18 Q It is possible that you did. Well, did you?

19 A As I say, I don't recall exactly. The only
20 thing that comes to my mind is that I might have had at the
21 time some stubs saying that they had paid to Ciudadanos Pro
22 Democracia.

23 Q Before I asked you if you had received a
24 letter from Mr. Visser as general manager, a copy of that
25 letter to General Counsel of the Federal Elections Commission,

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1
2 dated January 25, 1980.

3 A I did, yes.

4 Q I have a copy of page 9 of that letter,
5 which I would like to have you look at and you have already
6 seen it.

7 Could you read to yourself this paragraph here
8 which starts, "In addition to ..." and it involves those
9 people's name. Have you read that paragraph that I just
10 showed you?

11 A Yes.

12 Q It says here that you were able to determine
13 that three individual contributions were actually provided
14 by three corporations, how were you able to do that?

15 MR. FAX: If you recall.

16 THE WITNESS: As I said before the only thing
17 I can recall is that the names are familiar because
18 I happen to know that these gentlemen are in
19 business.

20 BY MR. BOGIN:

21 Q Is it possible that these people wrote a
22 check out to Ciudadanos Pro Democracia?

23 A It is possible. It is possible that they
24 did.

25 Q And then is it possible that a money order was

1
2 made out from these checks that these checks were cashed
3 and a money order was then made out in that money and then
4 contributed to George Bush for president committee?

5 A I cannot tell you that. I don't know.

6 Q And apparently you did identify these people
7 as having made contributions.

8 MR. FAX: The paragraph seems to explain how.
9 Just because those individuals are officers in
10 specific corporations, so she links the two
11 together, the names.

12 BY MR. BOGIN:

13 Q Once again, you are to identify whether
14 certain contributions were made as individuals or from
15 corporations and you were able to tell that three contributions
16 aggregating \$400 made by Francisco Carvajal, Francisco
17 Carrera and S. Luna, were not made by these individuals,
18 how did you know that?

19 A I said I don't recall right at the moment.
20 The only thing that might have happened is the fact that I
21 associated those names with companies. I mean, for example,
22 everybody knows that Carvajal is the head of the Olympic
23 Mills. Everybody knows that Carrera is the head of the
24 other one. Perhaps, maybe I did it just to be on the safer
25 side, inasmuch as I wanted to help in the whole thing,

1
2 I would rather have it look that they were not, than it
3 might have turned out that they were actually individuals.
4 It was done with the best intention that everybody was put
5 in, that I thought might have to be put in.

6 Q Off the record.

7 (Discussion off the record.)

8 BY MR. BOGIN:

9 Q I want to get into some mechanics of the
10 sending of money to Texas. I will let you describe what
11 you did or what the committee did and tell me when it was
12 you or when it was some other people.

13 When you got money and sent it over to the Bush
14 committee in Texas, give me the mechanics of actually sending
15 the money over.

16 A The mechanics were quite simple. Money came
17 usually at the meetings. For example, somebody brought a
18 \$20 check for a ticket and handed it over to whoever was
19 available. As I say, the treasurer was very seldom there.
20 They were informed that they had to fill out a card also so
21 that they could be credited for that and the person filled
22 it out there and then any one of the girls in the office
23 would wait until they had maybe three or four and then send
24 them.

25 Q Okay. How did the girls in the office get

1
2 these?

3 A Because they were also at the meetings.
4 These meetings were held, for your information, after five
5 o'clock. We usually met between five-thirty and eight or
6 eight-thirty and all the people that worked with me were
7 in my committee, so they would be at the meetings like
8 regular members.

9 It was easier for them because they were there
10 and they had the facilities to pick up the checks and pick
11 up the cards and maybe hold three or four until the
12 contributions could be sent out.

13 Q Did anybody keep a list of the people that
14 contributed?

15 A I don't believe so because some contributions
16 were sent directly through the people themselves to
17 Houston.

18 As I said, everybody got that letter and card.
19 Some instances might be that one of the girls sent a list
20 together with the contributions, it is possible, I don't
21 know. It is possible that it might have happened.

22 MR. FAX: Did somebody keep a list of all
23 of the contributions that came into your office?

24 THE WITNESS: No, because I presume nobody
25 ever bothered about that. Simply because we were

1
2 told that all the accounts would be kept in
3 Houston and not by us.

4 MR. FAX: You sent everything right on?

5 THE WITNESS: Everything was sent. We never
6 kept any money. We never used any money.

7 BY MR. BOGIN:

8 Q The people who actually sent the money over,
9 they were employees of the State Insurance Fund?

10 A Yes.

11 Q They were your personal secretaries?

12 A Some might have been. Those who sent the
13 ones from the office, as I said, the letters of contribution
14 were sent by the same people.

15 Q Were there ever any accompanying memorandum
16 or notes from your or anybody else with these contributions
17 when they were sent to Texas?

18 A As I say, I personally did not send any.
19 Some of the girls might have sent, not a memo but perhaps
20 just a list saying, "We are forwarding this." I really
21 don't know.

22 Q Were these girls under your sole direction?

23 A Well, they worked for me.

24 Q So you could tell them what to do or not?

25 A Exactly.

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2 Q So did you direct them to send the
3 contributions over when they got them? What instructions
4 did you give these girls?

5 A In the open meeting the instructions were
6 given that we would like to send the contributions as they
7 came in. As I say, some send their own, some of the girls
8 if they happen to be the one that gets the contribution,
9 would just send them on.

10 EXAMINATION

11 BY MR. PONDER:

12 Q I want to understand what your responsibilities
13 were as chairman. I understand you to say that the girls
14 in your office carried out the mechanics of sending the
15 money.

16 A Some of them and some of the money.

17 Q Some of the money, that was contributed at the
18 committee to Houston. I presume that the girls though would
19 not have done this on their own. Did you set up the
20 mechanics for this to go on, on a routine basis?

21 Did you never give any directions, is what I am
22 asking you, for this procedure to happen?

23 A What I tell you, in an open meeting the girls
24 were there and the money came. Any one of four or five could
25 have taken it.

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2 Q But did you understand that as chairman of
3 Mr. Bush's campaign committee, you had the responsibility
4 for the reporting, accurate reporting of these contributions?

5 A Well, I was under the impression that that
6 should have been the responsibility of the finance chairman
7 but we never had a finance chairman. So we made do with
8 what we had as we went along.

9 Q Are you saying then that you assumed no
10 responsibility for the transmittal of the contributions to
11 Houston?

12 A Well, indirectly, yes.

13 MR. FAX: Yes, you were responsible?

14 THE WITNESS: Yes, I was responsible, yes.
15 For the sending, to make sure that no money came
16 in and was kept in a desk, yes. Every single
17 penny that came in was sent, or put in the account.

18 MR. PONDER: Thank you.

19 EXAMINATION

20 BY MR. FAX:

21 Q Mrs. De Vincenti, is it common practice, has
22 it been your practice in your involvement in Commonwealth
23 politics to spend time after hours at the office with
24 personnel working with you on these things?

25 A That has been a practice here.

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Q For how long?

A Maybe 12 years, 14 years.

Q And you have been involved in how many campaigns in 12 or 14 years?

A They have been campaigns for the governor, for the mayor.

Q Over a hundred campaigns?

A Maybe not a hundred, certainly 50 or 75.

Q Did anyone ever advise you that it could be improper to have your coworkers working with you on political matters? Did anyone ever advise you of that?

A I want to state for the record that our work was always done after hours.

Q Just answer my question. Did anyone ever advise you that it was improper to have your coworkers work with you ?

A No.

Q Did anyone ever advise you that it was improper to use your office, office equipment for that purpose?

A No.

Q Is it typical, in your experience, to use your office facilities to work on political matters?

A It is typical, particularly after working

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hours.

Q To your experience is that done throughout the Commonwealth?

A Yes, every party in power does it and I guess we will continue to do it.

Q Was there ever a checking account opened for the committee for democracy?

A No, we only had the savings account.

Q So it would not have been possible then to literally deposit checks and write checks on that account?

A That is correct.

Q But money orders were a means of transmitting funds?

A Correct.

Q Did you ever have any knowledge that any of your conduct or activities may be in violation of the Federal Campaign Laws?

A I did not, until I was told that we could not accept corporate checks.

Q The actions that you took, subsequent to that knowledge, the actions that you took with respect to the committee for democracy, did you ever have knowledge or belief, until this investigation began, that those actions may be in violation of Federal Campaign Laws?

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A Never.

Q If you had been so instructed, would you have nonetheless done what you did or would you have done things in a different way?

A If I had been so instructed, I would never have attempted this. I am really, what shall I say, a respectable citizen. I have a clear bill of my actions in politics and public life.

Knowingly, I would never do anything against the law. If I have erred, it has been done in good faith because of ignorance because I was perhaps carried away by our customs. Basically mine is an animal of habits and we react emotionally to politics. We tend to do things the way we have been doing it. After you have been acting in a certain way for 15 or 20 years or 25 years, it is natural that you should tend to act in exactly the same way, particularly when you have never had absolutely any experience with the federal law or with the Federal Elections or with national politics.

Q All the money that was collected for the Ciudadanos Pro Democracia, to any of your knowledge, was any of that money spent on anything other than the committee of George Bush campaign? When I say that, I mean either for expenses, if there were any or contributions themselves?

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Did anyone keep any of the money?

A No.

Q Did you keep any of the money?

A No, we had figured originally on being able to continue, if none of this would have happened, we would have continued our educational process on statehood and primaries and elections. But as soon as I got word from Houston that what we were doing was not the correct thing, we stopped everything. We never got another penny of contributions of any kind.

Naturally we could not spend any money.

Q To your knowledge, the money that had been collected by them, was any of it spent for purposes for anything other than the George Bush campaign?

A Not to my knowledge.

Q Did you attempt to make full disclosure to Jeb Bush of what you had done?

A Definitely, when he called I said, if I had acted incorrectly, I was willing to take the responsibility of what was happening, to the extent that it was mine. That I would stop all kinds of activities. I resigned by the end of December as committee chairman and I said that I was in the best of spirits to disclose whatever was asked and to cooperate, as a matter of fact, I was even willing to

1
2 go to Washington. I did not go as you know, because I have
3 a strike looming, it might have just started before I get
4 back to the office.

5 I felt that it wasn't right for me to leave the
6 island.

7 Q And you were Secretary of Labor of the
8 Commonwealth of Puerto Rico?

9 A I was Secretary for four years.

10 Q And your father before you was?

11 A He was the first commissioner of Labor at the
12 time it was called that.

13 Q You were the first woman in the cabinet?

14 A I was the first woman in the cabinet.

15 MR. FAX: I would like to make one clarifying
16 statement. I am still concerned about the issue
17 of Mr. Geigel giving the oath. I would like it
18 clear on the record that we were trying to
19 accomodate you and that it was only because there
20 was not a notary present at your behest to give
21 the oath that we agreed to that procedure.

22 I am just troubled by the notion of counsel
23 representing the witness, giving the oath. I don't
24 know that it presents a problem but I don't want
25 anyone to blame us. If you could just acknowledge

1
2 that or say something.

3 I know that between us, as among the group of
4 us, it won't be an issue but some third party could
5 conceivably make it an issue.

6 MR. PONDER: It is our understanding that
7 in Puerto Rico the attorneys, as well as notary
8 publics are able to give an oath, is that correct?

9 MR. GEIGEL: No, to be a notary public in
10 Puerto Rico, you have to be an attorney. It is
11 not necessarily so that an attorney is a notary
12 public. It is not unheard of that the attorney
13 for one of the witnesses gives an oath. I would
14 not go to the extent to say that it is done every
15 time but it is not unusual.

16 MR. FAX: Only attorneys are notaries.

17 MR. PONDER: But you have stated to us that
18 you are a notary. With that understanding we have
19 accepted that as being sufficient.

20 MR. FAX: In a sense it is at your request
21 that we did it, so we could go on.

22 MR. PONDER: Yes, it is at our request and
23 we are satisfied with the propriety of it.
24
25

EXAMINATION

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3 BY MR. PONDER:

4 Q I have one thing that I would like to say
5 in light of the discussion that you have had with Mr. Fax.

6 You were saying that this impropriety that we
7 have been discussing, the violation of the Federal Campaign
8 Law --

9 MR. FAX: Alleged violation.

10 BY MR. PONDER:

11 Q I am sorry, alleged violation, stems in a
12 large part from the political practices which you are
13 accustomed to in Puerto Rico, is that correct?

14 A That is correct.

15 Q My understanding is that corporate money is
16 permissible to be used in local politics, is that correct?

17 A That is correct.

18 Q In your experience over all of these years
19 that you have been describing, of your activity in local
20 politics, have you ever been aware or have you taken a
21 corporate contribution given in connection with local
22 elections and translated that into a personal money order
23 to a local campaign?

24 A Personally, I have not done it but I have
25 been in lots of groups that have done it. Because as I

1
2 explained before, my experience has been mostly in politics.
3 Straight politics. I have not been associated with fund
4 raising or money handling and so forth.

5 Q I am just trying to get a better understanding
6 of the situation. Could you answer the question of why a
7 corporate contribution given in connection with a local
8 campaign would be translated into a personal money order,
9 what purpose would that serve?

10 A I did not get you.

11 Q If a corporate contribution was made to a
12 political committee in a local election, why would it be
13 translated into a personal money order? If it is legal for
14 it to be contributed to a campaign anyway, what would be
15 the purpose of changing it to a personal money order?

16 A Since it is given to be used as the group
17 sees fit -- if you have a group called, we have groups that
18 have been called, say the friends of the PNP. Now, friends
19 of the PNP might get all kinds of checks from corporations
20 and other people and they decide that they are going to give
21 some of the money to John Doe who is running for assemblyman
22 or is going to give some money to so and so who is running
23 for mayor. Then they would have to get that money and
24 translate it into a money order or cash or check or whatever,
25 so it can go to John Doe. Otherwise there would be no way

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2 that you could give that money to the particular candidate.

3 Q But the money order that would be issued
4 would be in the committee name, rather than the individual
5 name, would it not?

6 A It depends. Within the group you might have
7 subgroups, one going for one and the other for the other.

8 It could very well be that the check could be an
9 individual signing it in that particular committee. It
10 depends on the circumstances. For example, if you have
11 let's say two or three candidates who want help and you don't
12 want to run the risk of antagonizing any one of them, you
13 might make it in the name of the committee or in the other
14 hand you might make it in the name of an individual.

15 It is very understandable at least here and it
16 is a frequent practice because you get money to use in
17 different ways for different purposes for different people.
18 Then you would have to issue, either checks or money order.

19 MR. BOGIN: We have no further questions.

20 Thank you very much.

21 (Whereupon, at 1:00 p.m. the deposition was
22 terminated.)
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REPORTER'S CERTIFICATE

I, DIANE BREAZ, Registered Professional Reporter
with the National Shorthand Reporters' Association;

DO HEREBY CERTIFY that the foregoing transcript
is a full, true and correct record which was taken down by
machine shorthand by me and thereafter reduced to typewriting
under my direction.

I FURTHER CERTIFY that I am in no way interested
in the outcome of the cause named in said caption.

Diane Breaz

CERTIFICATE OF NOTARY PUBLIC

I, RAFAEL GEIGEL-VASSALLO, duly commissioned and qualified in and for the Commonwealth of Puerto Rico,

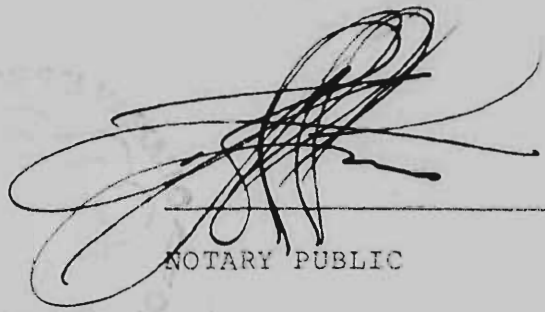
DO HEREBY CERTIFY that the foregoing deposition was taken before me acting as notary on the date and time heretofore mentioned;

That the reporter and the deponent were sworn before the commencement of the taking of the deponent's testimony;

IN WITNESS WHEREOF, I sign these presents and affix my notarial seal in San Juan, Puerto Rico this

14 day of April, 1980.

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IN RE:

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DEPOSITION OF:

POLLY ALEMANY

March 20, 1980

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IN RE: :
MUR-1181 :

DEPOSITION OF:

POLLY ALEMANY

was taken at the law offices of Rafael Geigel-Vassallo, Esq.,
Pan Am Building, Suite 504, Hato Rey, Puerto Rico on
March 20, 1980 at 1:30 p.m.

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APPEARANCES:

ROBERT I. BOGIN, ESQ.
HAL PONDER, ESQ.
Federal Elections Commission
1325 K Street
Washington, D.C.

RAFAEL GEIGEL-VASSALLO, ESQ.
Pan Am Building - Suite 504
Hato Rey, Puerto Rico
Attorney for Julia Rivera De Vincenti, Rafael Fuentes and
Polly Alemany

BARBARA COHEN, Interpreter

MR. GEIGEL: For the record, I am Mr. Rafael Geigel. For the purpose of this deposition I am representing the witness Mrs. Alemany.

I have expressed to her that I represent Ms. Julia Rivera De Vincenti, she is aware of it and she understands that she is my principle client. I have also told the witness her right to remain silent and not to incriminate herself. She has understood her right and she has waived it.

She also understands that she is not a target of this investigation, she is merely a witness for the investigation.

Again, I have been requested by the Commission, due to Puerto Rico laws, a notary is required to take the oath, as there is no other authorized notary at this time, I have been requested by the Commission to take the oath of the witness, the translator and the court reporter.

MR. BOGIN: Yes, we have stipulated that we have requested you to do that.

MR. GEIGEL: So we will proceed then to take the oath.

(The deponent, the interpreter and the court reporter were duly sworn by the notary public.)

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2 Whereupon,

3 POLLY ALEMANY

4 was called as a witness and after first having been duly
5 sworn by the notary public, was examined and through the
6 interpreter, testified as follows:

7 EXAMINATION

8 BY MR. BOGIN:

9 Q Did you understand what Mr. Geigel has just
10 said?

11 A No.

12 Q Would you like the translator to speak to you
13 in Spanish and tell you what Mr. Geigel has just said?

14 A I have no doubt about what he said.

15 Q May I have your name for the record, please.

16 A Polly Alemany.

17 Q And your address?

18 A Amazona 136, Urbanization Paricio, Rio
19 Piedras, Puerto Rico.

20 Q And Mrs. Alemany, what do you do, what is
21 your occupation?

22 A I am an administrative assistant to Julia
23 Rivera De Vincenti.

24 Q How long have you known Julia Rivera De
25 Vincenti?

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A About 20 years.

Q And when did you first meet her?

A In the Labor Department, when she was the Secretary of Labor. Previously, I knew her previously, also.

Q How did you know her for the first time?
How did you meet her?

A I met her at a family reunion party .

Q How long have you been Mrs. Vincenti's administrative assistant?

A In the State Insurance Fund?

Q Right.

A Three years.

Q And before that, what was your relationship to Mrs. Vincenti before the State Insurance Fund?

A In the municipal, in the San Juan Municipal and we had an office in Rio Piedras.

Q Were you Mrs. Vincenti's administrative assistant in the municipal?

A Yes.

Q So would it be fair to say that you have had a long working relationship with Mrs. Vincenti?

A Yes.

Q Are you under the personal direction of

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Mrs. De Vincenti?

A Yes, exactly.

Q Are you a permanent employee at the State Insurance Fund?

A Yes, permanent.

Q Could Mrs. Vincenti fire you, if she wanted to?

A No, because I am permanent.

Q Were you active in the George Bush for president committee in Puerto Rico?

A Yes.

Q When were you first active with the George Bush for president committee?

A I don't remember the exact date but it was somewhere around September.

Q And what was your first involvement?

A The meetings.

Q How did you know to attend the meetings?

A Right there because we were in the office.

Q How many meetings did you attend?

A The exact number, I don't know but many.

Q More than five?

A About five.

Q Who else besides yourself was present at these

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2 meetings?

3 A Many people.

4 Q About how many people?

5 A It varied sometime, from 50, 25, 35.

6 Q Was Mrs. Vincenti always present at these
7 meetings?

8 MR. GEIGEL: Excuse me, please, again, from
9 her own personal knowledge, she stated that she
10 has not attended all the meetings, so only those
11 meetings she has attended she can talk about.

12 BY MR. BOGIN:

13 Q So, I will change the meeting. Every meeting
14 that you were at, was Mrs. Vincenti there?

15 A Yes, she was.

16 Q Did Mrs. Vincenti chair these meetings?

17 A Yes, because everybody talked.

18 Q I don't think I got through on that one.
19 Who ran these meetings?

20 A Well, she did.

21 Q And how did she do that, could you describe
22 how she ran these meetings?

23 A There was nothing formal, but we just knew
24 that it was to orient the people concerning the primaries.
25 Just to orient the public to talk about Bush.

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Q Were these meetings held, where were these meetings held?

A In the conference room at the State Insurance Fund.

Q At what time usually were these meetings held?

A After office hours.

Q Were other employees of the State Insurance Fund present at these meetings?

A Yes.

Q Were there people at these meetings other than the people from the State Insurance Fund?

A Yes, of course.

Q Who were these people?

A People who wanted to know more about what the primaries were about.

Q How did they hear about the meetings?

A The word passed around.

MR. GEIGEL: Could you translate that a little bit more exactly.

THE INTERPRETER: "We told each other or people would tell other people."

THE WITNESS: The Republicans would tell more to other Republicans who wanted to know more

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1
2 about the primaries.

3 BY MR. BOGIN:

4 Q Were you present at a meeting when there was
5 a discussion concerning corporate contributions?

6 A I was present after a couple of meetings where
7 they mentioned that contributions, Mr. Rodriguez mentioned
8 that contributions from corporations could not be accepted.

9 Q Who was Mr. Rodriguez?

10 A A lawyer by the name of Rodriguez who also
11 went to the meetings.

12 Q Was he an officer for the Puerto Rico Bush
13 for president committee?

14 A I don't know if he was an official because
15 they were informal meetings.

16 Q Were you an official for the Bush committee?

17 A Since they were informal meetings, everyone
18 could talk, everyone could give opinions.

19 Q Were you an official?

20 A No.

21 Q Mrs. Vincenti was chairman of the committee?

22 A Yes, she was in charge of the committee.

23 Q But you had no official functions within the
24 committee?

25 A No, no official functions.

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2 Q And you said before that you were present
3 when Mr. Rodriguez said that the committee could not accept
4 corporate money for the campaign?

5 A Yes, exactly.

6 Q Do you remember how this discussion arose?

7 A I know that it was said but I don't remember
8 the exact moment because I would come in and out of the
9 meetings and it was informal.

10 Q Do you know why it was said?

11 A It was brought in relation to some checks,
12 from corporations.

13 Q Were these checks from corporations in
14 connection with a cocktail party in September of 1979?

15 MR. GEIGEL: Please wait for the
16 translation before you answer because apparently
17 your English is -- there may be a language problem
18 and you may not understand what he is trying to
19 tell you in English. So wait for the translation
20 since it is your privilege.

21 (The last question was repeated.)

22 THE WITNESS: A cocktail party that was
23 going to be given.

24 BY MR. BOGIN:

25 Q Did you get any of these checks?

1
2 A No, I did not receive them. I did not
3 receive any.

4 Q Did you buy a ticket to this cocktail party?

5 A No.

6 Q Did you have any of your friends buy tickets
7 to the cocktail party?

8 A No, I don't know.

9 Q Were you responsible in any way for selling
10 tickets to this cocktail party?

11 A No.

12 Q Do you recall what happened at the meeting
13 after Mr. Rodriguez said that the corporate checks could
14 not be accepted by the committee?

15 A No.

16 Q Do you remember if there was a discussion
17 that these checks should be returned to the corporations?

18 A Yes. They were going to return the checks.

19 Q Were you present at any meeting when there
20 was a discussion concerning Ciudadanos Pro Democracia?

21 A Yes. Someone brought onto the floor that
22 you could open an account to Ciudadanos Pro Democracia.

23 Q Was that during the same meeting that
24 Mr. Rodriguez said that corporate checks could not be
25 accepted by the Bush committee?

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A No because that was in different meetings.

Q Was it a subsequent meeting?

MR. GEIGEL: Hold it, you are asking additional questions.

BY MR. BOGIN:

Q Did the discussion concerning Ciudadanos Pro Democracia come at a meeting after the meeting that Mr. Rodriguez said that the committee could not accept corporate contributions?

A It occurred at a meeting. I couldn't say .

Q Do you know whose idea it was to form this committee Ciudadanos Pro Democracia?

A No.

Q Were you present when this idea was formulated at the meeting?

A When the idea was mentioned, I was present.

Q But you don't remember who said it?

A No.

Q Did Mrs. Vincenti say it?

A No, it was the group and everyone talked but in particular, no.

Q How was this idea adopted?

A After Mr. Rodriguez said they could not accept the corporate money.

1
2 Q Let me clarify this again. Somebody had an
3 idea to form a committee called Ciudadanos Pro Democracia,
4 is that correct?

5 A In the meeting someone said that.

6 Q Did the committee form this Ciudadanos Pro
7 Democracia?

8 A Yes, because it was the same people that were
9 there.

10 Q Who made the decision to form this committee,
11 Ciudadanos Pro Democracia?

12 A I don't know.

13 Q How was any decision made at these meetings?

14 A Exactly how they were made, I don't know.

15 Q Was there a vote?

16 A No.

17 Q Did Mrs. Vincenti say that a decision was
18 made?

19 A No, I did not hear her say that.

20 Q Whose decision was it to have a fund raiser
21 in September for George Bush?

22 A A group of people.

23 Q The group makes a decision?

24 A I don't know who made the decision. The
25 group talked but I don't know who made the decision.

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Q Is there a vote taken?

A There was no vote taken, no.

Q Does the chairman make the decision?

A No.

Q Could you describe how a decision is made at these meetings?

A In these meetings?

Q Yes.

A I could not describe it. I know that everybody voiced their opinions.

Q People were invited to these meetings to become oriented to George Bush, is that correct?

A About the primaries, in regard to the primaries in Puerto Rico, there had never been any before.

Q Were these people volunteer workers for George Bush?

A Yes, voluntary.

Q Were these people that would also make contributions to George Bush?

A The people in particular?

Q What I am trying to get at is, in the form of a question, I want to know who these people were, what they were doing at these meetings.

A Organizing to go out into the island to

1
2 orient the people about the primaries and George Bush.

3 Q Did you open a savings account for Ciudadanos
4 Pro Democracia?

5 A Yes.

6 Q Who directed you to open this account?

7 A I thought I could help by doing that
8 voluntarily.

9 Q But didn't some person ask you to do this?

10 A No, we ourselves did not, I decided that
11 I could help by doing this.

12 Q Whose idea was it to open a savings account?

13 A The group.

14 Q And then you just volunteered to open up an
15 account?

16 A We were closer to the bank, Rafi Fuentes and
17 I and we thought we could do this by being closer.

18 (At which time there was an off the record
19 discussion.)

20 BY MR. BOGIN:

21 Q Mrs. Alemany, did you make any contributions
22 to the George Bush for president committee?

23 A In my name I sent some checks but they were
24 some checks that came and I deposited them in my account,
25 that is done here and then I made a personal check.

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2 Q Those checks that you put in your account,
3 who were those checks made out to?

4 A The Ciudadanos Pro Democracia committee.

5 Q Ciudadanos Pro Democracia?

6 A Yes.

7 Q How did you get the checks written out, which
8 were written out to Ciudadanos Pro Democracia?

9 A In a meeting, they were brought to a
10 meeting.

11 Q And somebody handed them to you?

12 A Doña Julia gave them to me.

13 Q And why did you put them in your account?

14 A So that they could be cashed faster because
15 since they were in my name, I deposited them in my account
16 and sent them immediately.

17 Q I would like to go back over that question.

18 A That is done in Puerto Rico.

19 MR. GEIGEL: Please wait for the question.

20 BY MR. BOGIN:

21 Q Did you ever deposit any checks from
22 corporations written out to Ciudadanos Pro Democracia, into
23 the account of Ciudadanos Pro Democracia?

24 A Not from corporations.

25 Q Was there ever any money deposited into the

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2 savings account for Ciudadanos Pro Democracia, to the
3 best of your knowledge?

4 A We opened an account for the committee of
5 Ciudadanos Pro Democracia.

6 Q And did you deposit money into that account?

7 A Some checks were deposited into that account,
8 exactly.

9 Q Did you receive checks that were not
10 deposited into that account?

11 A No.

12 Q What about those checks that you put into
13 your own account?

14 A The ones that I put into my account, I
15 deposited into my account some checks and we opened the
16 account with all the checks that arrived.

17 Q Did you ever take some checks and get money
18 orders with them?

19 A Yes, I did not go to the bank but the forms
20 were filled out for money orders.

21 Q You had to sign a form for the money orders?

22 A Yes.

23 Q Was that a withdrawal slip or what kind of a
24 slip did you have to sign?

25 A To withdraw from the bank.

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Q Yes?

A A signature from a prepared slip from the bank.

Q Who else had to sign the slip?

A Rafael Fuentes.

Q So both names had to appear on the slip?

A Yes, to withdraw money.

Q Did anyone direct you to do this?

A Yes, Doña Julia told us to take the money out.

Q Did anybody suggest that you should deposit some of these checks into your own account?

A The checks that I deposited, if someone suggested that to me?

Q Yes, into your account.

A In order not to have to go to the bank, I thought by myself that I could deposit it into my own account.

Q For your own convenience and speed?

A Exactly.

(At which time there was a five minute recess.)

BY MR. HOGIN:

Q Mrs. Alemany, did you open a savings account for Ciudadanos Pro Democracia?

A Yes.

1
2 Q And do you recall how much money you
3 deposited when you opened that account?

4 A The amount, no, I don't remember.

5 Q Approximately?

6 A Well --

7 Q Let the record reflect that there is no
8 answer.

9 Did you make deposits after that day into that
10 account?

11 A Yes, they were made. I did not go to the
12 bank but the slip was filled out.

13 Q Deposit slips?

14 A Yes, deposit slips.

15 Q And did you give those slips to Mrs. Vincenti?

16 A Yes, to Fuentes for the second signature.

17 Q And do you know, do you happen to know what
18 Mr. Fuentes did with the deposit slips?

19 A No, I just gave it to him and I imagine that --

20 Q Okay, I want to talk about the money that
21 you deposited into your account. Did you make the deposit
22 all at once?

23 A Yes, in my account.

24 Q And how much money was that?

25 A Five hundred dollars.

1

2

Q And how many different checks was that made up of?

3

4

A Five checks of \$100.

5

6

Q And do you know if each one of these checks was from a corporation?

7

A No, Ciudadanos Pro Democracia.

8

9

Q Was the check from a corporation to Ciudadanos Pro Democracia, do you know?

10

A No, I don't know.

11

Q Did you sign on those checks your name?

12

13

A To put them into my account, the number of my account.

14

Q Did Rafael Fuentes also have to sign?

15

16

A Not those, because those were for my personal account.

17

18

Q But the checks were written out to Ciudadanos Pro Democracia.

19

20

A Yes, but he did not have to sign them because I was going to deposit them in my account.

21

22

Q And you got all five of the checks at the same time?

23

A Yes.

24

Q And who gave you those checks?

25

A Doña Julia gave them to me at a meeting.

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1
2 Q And did she suggest that you should put them
3 in your account?

4 A No, I suggested it to her.

5 Q And the reason for that was?

6 A To not fill out a slip and make the checks
7 go out rapidly.

8 Q Do you know Miss Hilda Julia?

9 A No.

10 Q Did you ever receive a check from any of her
11 corporations?

12 A No.

13 Q Did you fill out a slip for withdrawing from
14 the savings account?

15 A Yes.

16 Q Did you ever personally withdraw money from
17 the savings account of Ciudadanos Pro Democracia?

18 A No.

19 MR. GEIGEL: For the record, he was referring
20 to the account of Ciudadanos Pro Democracia in
21 the question before this last one.

22 BY MR. BOGIN:

23 Q You never withdrew any money from the savings
24 account for Ciudadanos Pro Democracia, did you?

25 A To go to the bank to take money out? I signed

1
2 and I gave it to Rafi.

3 MR. BOGIN: I have no further questions.

4 MR. GEIGEL: I have a few, if I may be
5 permitted.

6 EXAMINATION

7 BY MR. GEIGEL:

8 Q Mrs. Alemany, have you ever had any
9 relationship with legal matters? Have you been involved
10 in those?

11 A No.

12 Q Have you ever been involved with a legal
13 office, with attorneys?

14 A No.

15 Q Have you ever been sued?

16 A No.

17 Q Have you ever sued anybody?

18 A Never.

19 Q Do you know of a law that is called the
20 Federal Elections Campaign Act?

21 A No, I don't know it.

22 Q Have you ever been given anything to read
23 in relationship to this law?

24 A No, to read, no.

25 Q What do you do in your employment?

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1
2 A I receive correspondence and according to the
3 contents of the correspondence, I make it arrive at its
4 destination.

5 Q In your work, do you read any correspondence
6 in English?

7 A Not much, not much.

8 MR. GEIGEL: That is it, no more questions.

9 MR. BOGIN: No questions. Thank you very
10 much.

11 (Whereupon, at 2:30 p.m. the deposition was
12 terminated.)

REPORTER'S CERTIFICATE

I, DIANE BREAZ, Registered Professional Reporter
with the National Shorthand Reporters' Association;

DO HEREBY CERTIFY that the foregoing transcript
is a full, true and correct record which was taken down by
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typewriting under my direction.

I FURTHER CERTIFY that I am in no way interested
in the outcome of the cause named in said caption.

Diane Breaz

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CERTIFICATE OF NOTARY PUBLIC

I, RAFAEL GEIGEL-VASSALLO, duly commissioned and qualified in and for the Commonwealth of Puerto Rico,

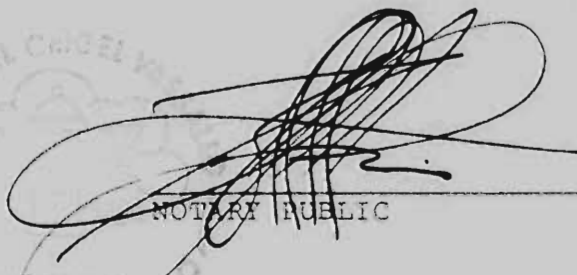
DO HEREBY CERTIFY that the foregoing deposition was taken before me acting as notary on the date and time heretofore mentioned;

That the reporter and the deponent were sworn before the commencement of the taking of the deponent's testimony;

IN WITNESS WHEREOF, I sign these presents and affix my notarial seal in San Juan, Puerto Rico this

14 day of April, 1980.

1577


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CHAPMAN, DUFF AND PAUL
1730 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006

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LAW OFFICES
CHAPMAN, DUFF AND PAUL
1730 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006

Robert Bogin, Esquire
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
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Signed R. Fogin
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Signed

Robert B. ...

date

June 3, 1981

9 7 4 0 2 9 2 1 9 2



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LAW OFFICES

CHAPMAN, DUFF AND PAUL

1730 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

TELEPHONE (202) 624-2800

CABLE ADDRESS

"CHADUP"

TELEX NUMBER 88-2788

COUNSEL
EUGENE T. HERBERT
GARY CLYDE HUPBAUER

SAN JUAN P.R. OFFICE
SUITE 204
PAN AMERICAN BUILDING
HATO REY, PUERTO RICO 00817
TELEPHONE (809) 788-6484

RAFAEL A. GEIGEL
RESIDENT ASSOCIATE

WRITER'S DIRECT DIAL NUMBER

WILLIAM R. DUFF
PAUL A. LENZINI
GENE PERRY BOND
JAMES S. HOSTETLER
LUIS GUINOT, JR.
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KIM H. BULLERDICK

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1325 K Street
Seventh Floor
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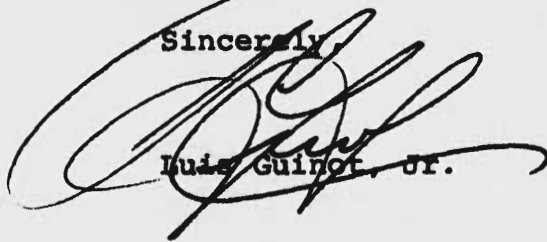
Re: In the matter of Julia Rivera
de Vincenti, MUR 1181

Dear Mr. Vogin:

Pursuant to our telephone conversation of last week,
enclosed please find a check in the amount of \$2,200 in
payment of the penalty agreed to in the above captioned
matter.

If you have in your possession the original check
issued, please return it to the undersigned for further
forwarding to Mrs. Rivera de Vincenti.

Sincerely,



Luis Guinot, Jr.

LGjr/gma
Enclosure

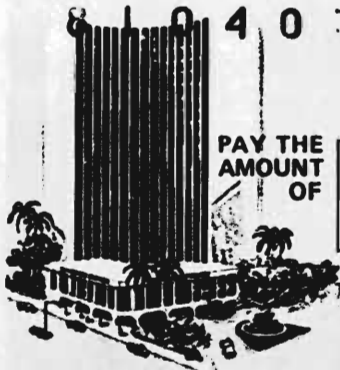
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TELETYPE UNIT

CL

MANAGER'S CHECK



PAY THE AMOUNT OF

****\$2200.00****

MO. DAY YR.
07-31-81

DOLLARS CTS.
****\$2200.00****

BANCO DE PONCE

PONCE, PUERTO RICO 00731

101-200
216
#29 1317176

TO THE ORDER OF:

U. S. TREASURY

[Handwritten Signature]
AUTHORIZED SIGNATURE
29

01-232
(2 of 2)

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