



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20541

THIS IS THE END OF TAP # 505

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August 13, 1979

Ms. Fran Hagan
Federal Election Commission
1325 K Street N. W.
Washington, D.C. - 20463

Dear Fran:

Please be advised the Comité Amigos de Jaime Benítez hereby certifies that as of July 10, 1979 the Committee had no receipts and no expenditures.

Since there has been no modification in the status of the Committee's accounts, the Committee will continue to file quarterly reports for the time being.

If you have any questions, please contact me immediately.

Sincerely yours,

José E. Alegría
Treasurer
Comité Amigos de Jaime Benítez

/rcp

80017324079

0011130
**BANKERS
FINANCE**



19 AUG 20 PM 3:37

Ms. Fran Hagan
Federal Election Commission
1325 K Street N. W.
Washington, D.C. - 20463

RECEIVED
FEDERAL ELECTION
COMMISSION

Bankers Finance Mortgage Corporation, 75 Condado Avenue, Condado, Puerto Rico 00907

MUR 505 10128



19 MAY 15 PM 12:22

May 10, 1979

902375

Ms. Fran Hagan
Federal Election Commission
1325 K Street N. W.
Washington, D.C. - 20463

Dear Fran:

Please be advised that Comité Amigos de Jaime Benítez hereby certifies that the Comité Amigos de Jaime Benítez has an outstanding debt of \$7,943.83 to Monique Lacombe Advertising and deposits in the bank of \$79.71 as of September 13, 1978.

There has been no change whatsoever since that date and I hereby certify from September 1978 to today date.

Also enclosed please find the names of the contributors that Don Jaime Benítez gave me, which were missing and were obtained from his office. This contributors donated \$100.00 each at the final weeks of the campaign in order to pay the media stations.

If you have any questions, please contact me immediately.

Sincerely yours,

José E. Alegría
José E. Alegría
President

JEA/rcp

Encls.

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9 MAY 16 11:35

Mr. Juan Sorroche
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Rio Piedras, Puerto Rico 00926

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Hato Rey, Puerto Rico 00917

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Rio Piedras, Puerto Rico

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Extensión Comandante
Carolina, Puerto Rico 00924

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Mrs. Adela Agrait Prieto
Repto. Montellano A-E-44
Cayey, Puerto Rico 00633

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Carolina, Puerto Rico

Mr. Eugenio Rivera
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Villa Fontana
Carolina, Puerto Rico

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Miss Teresa Colón
Box 21992 - UPR Station
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80010324110

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RETURN RECEIPT REQUESTED

CERTIFIED
No. 511003
MAIL



Bankers Finance Mortgage Corporation,
75 Conlatale Ave., Conlatale, P. R. 00907, 725-6244

Ms. Fran Hagan
Federal Election Commission
1325 K Street N. W.
Washington, D.C. - 20463



AIR MAIL



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Comite Amigos de Jaime Benitez)

MUR 505
NF 054

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, hereby certify that January 10, 1979, the Commission, meeting in an Executive Session at which a quorum was present, determined by a vote of 6-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Find probable cause to believe that the Committee failed to adequately report and keep records as set forth in 2 U.S.C. §432(c) (1) and (2) and §434(b) (2) - (8).
2. Find probable cause to believe that the Committee accepted illegal corporate contributions prohibited by 2 U.S.C. §441b(a).
3. Find probable cause to believe that the Committee failed to disclose the Committee depository as required by 2 U.S.C. §433(b) (9).
4. Find probable cause to believe that the Committee failed to include the required notification for solicitation literature as set forth in 2 U.S.C. §435(b).
5. Find probable cause to believe that the Committee failed to file the 1977 Quarterly and Year End Reports and April 10, 1978, Quarterly Report as set forth in 2 U.S.C. §434(a) (1).
6. Authorize the General Counsel to file a lawsuit.

1/10/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

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5. Found reasonable cause to believe that the Committee failed to file the 1977 Year End Report and April 10, 1978, Quarterly Report as set forth in 2 U.S.C. § 434(a)(1).

Upon notification of the findings and receipt of the conciliation agreement, the Committee Treasurer contacted the Office of General Counsel regarding efforts to conciliate. The Committee complied substantially with the Act's requirements in findings 2, 3, and 5 above by submitting the following documents:

- a. Copies of refund checks issued to each corporate contributor (prior to cancellation).
- b. Amended statement of organization disclosing the Committee's campaign depository.
- c. Reports covering Year End 1977, April 10, 1978, and July 10, 1978.

Finding 4 relates to past fundraising efforts and cannot be corrected retroactively.

In the case of Finding 1, the Committee failed to maintain records for receipts totaling \$15, 135 (40% of total receipts), including two cash deposits, each greater than \$5,000. These receipts, combined with others to total \$18,088.28, were not originally reported to the FEC. To date, the Committee has not identified the source of these receipts which were included in the 1976 amended reports filed February 1, 1978.

On October 12, 1978, the Committee Treasurer met with the General Counsel's staff to discuss the conciliation's progress. At that meeting, we agreed upon a tentative timetable for speedy resolution of the remaining matters. The Treasurer agreed to obtain the receipts records from the Candidate's home and provide them for our review.

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Subsequent telephone calls between this Office and the Committee Treasurer in Puerto Rico produced repeated verbal assurances that efforts were underway to comply with the Conciliation Agreement. The Treasurer insisted that the Committee was arranging a fundraising event to repay the 1976 campaign debt and thereafter, terminate the Committee's reporting obligation. To date, we have received no confirmation that such an event took place. Early on, the Committee indicated its intention to offer a counterproposal to the Commission's proposed agreement. However, we have received no Committee documents regarding this matter.

Therefore, thorough efforts at conciliation having failed, the Office of General Counsel recommends that the Commission find probable cause to believe that the herein-named violations occurred, and at the same time find probable cause to file suit on the issues involved in this matter.

Recommendations

1. Find probable cause to believe that the Committee failed to adequately report and keep records as set forth in 2 U.S.C. § 432(c)(1) and (2), and § 434(b)(2)-(8);
2. Find probable cause to believe that the Committee accepted illegal corporate contributions prohibited by 2 U.S.C. § 441b(a).
3. Find probable cause to believe that the Committee failed to disclose the Committee depository as required by 2 U.S.C. § 433(b)(9);
4. Find probable cause to believe that the Committee failed to include the required notification for solicitation literature as set forth in 2 U.S.C. § 435(b); and

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5. Find probable cause to believe that the Committee failed to file the 1977 Quarterly and Year End Reports and April 10, 1978, Quarterly Report as set forth in 2 U.S.C. § 434(a)(1).
6. Authorize the General Counsel to file a lawsuit.

4 January 1979
Date



William C. Oldaker
General Counsel

Attachment - 9 pages

90010324116

February 1978

Audit Findings and Recommendations

A. Recordkeeping for Receipts

Section 432(c)(1) and (2) of Title 2, United States Code, states that the treasurer of a political committee shall keep a detailed and exact account of all contributions made to or for such committee, to include identification of every person making a contribution in excess of \$50 with the date and amount thereof and, if a person's contributions aggregate more than \$100, the account shall include occupation, and the principal place of business (if any).

Section 104.12(b) of Title 11, Code of Federal Regulations, requires in part, that each political committee required to file reports under the Act shall; 1) maintain records with respect to the matters reported, including vouchers, worksheets, receipts, bills and accounts, which shall provide in sufficient detail the necessary information and data from which the filed reports may be verified, and 2) keep those records available for audit or inspection by the Commission or its authorized representatives for a period not less than three (3) years.

During our audit we examined the Committee's receipt records which consisted of listings of the contributors' name, amount and date contributed, covering the period June 8, 1976, the inception date, to October 30, 1976. Receipt records could not be located for the period November 1 - December 31, 1976. A comparison was made between available receipt records and total reportable receipts shown in the bank records from inception through September 30, 1977. Receipts per the Committee's bank records totalled \$37,812.99; however, available contributor records totalled only \$22,677.99 thus leaving a total of \$15,135 of receipts which were undocumented (40.03% of total receipts).

In addition, our review of the Committee's bank records revealed two (2) large cash deposits during the week just prior to the general election, as follows:

<u>DATE PER DEPOSIT TICKET</u>	<u>CASH</u>	<u>CHECKS</u>	<u>TOTAL DEPOSIT</u>
10/27/76	\$6,380.00	-0-	\$6,380.00
11/3/76*	\$5,110.00	\$1,550.00	\$6,660.00

* Was reflected on the bank statement at October 29, 1976.

The Committee also failed to retain deposit receipts for four (4) deposits (July 28, September 17, October 6 and November 26, 1976), totalling \$17,440.00.

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It is the opinion of the Audit staff that these two (2) large deposits, when added to the bank deposit of \$1,805 on November 26, 1976 (the only bank credit for the period November 1 - December 31, 1976), for a total of \$14,845, represent the bulk of the \$15,135 of receipts for which the Committee apparently maintained no records.

When questioned, the Treasurer was not able to identify the source of the large cash deposits or explain the large overall discrepancy in receipt records. The Treasurer was also unsure whether or not the contributors of these funds were included in the contributor lists reviewed by the Audit staff for the period ending October 30, 1976.

Recommendation

We recommend that the Committee and/or the Candidate make a reasonable effort to identify the sources of the unsupported contributions and furnish copies of documentation obtained, to include the four (4) unavailable deposit receipts, or evidence of their efforts to obtain the documentation, to the Audit staff for review, within 30 days of the Committee's receipt of this letter.

B. Reporting of Receipts

Section 434(b)(2) through (8) of Title 2, United States Code, requires reports filed under the Act to contain certain information with respect to receipts including the total sum of individual contributions not otherwise itemized, the itemization of certain other types of receipts, and the total sum of all receipts made by or for the committee during the reporting period.

During the course of our audit, an examination of the Committee's bank records revealed a total of \$18,088.28 ^{1/} in receipts which the Committee did not report to the Commission. This represents 47.84% of the Committee's total reportable receipts. Because of the recordkeeping problem discussed in Finding A, \$15,135.00 of these unreported receipts remain unidentified. It is the opinion of the Audit staff that, based on our review of the available records, the balance of the unreported receipts (\$2,953.28) ^{1/} is comprised of contributions from individuals.

Our audit also revealed that the Committee reported unnecessarily, and included in its receipt totals, expenditures made on its behalf by the State Popular Democratic Party totalling \$9,953.67.

^{1/} Of this amount, \$500 was itemized by the Committee on Schedule A, but not included in its receipt totals.

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We recommended that the Committee file a comprehensive amendment for 1976 reflecting an increase in Committee receipts for the period of \$8,134.61. On February 1, 1978, we received the Committee's 1976 comprehensive amendment which reflected the correct summary page total for receipts.

Recommendation

We recommend that the Committee file a supplementary amendment itemizing as necessary, those undocumented receipts discussed in Finding A for which records are obtained.

C. Apparent Corporate Contributions

Section 441b(a) of Title 2, United States Code, states in part, that it is unlawful for any corporation to make a contribution to a political committee in connection with any election, or for any candidate, political committee, or other person to knowingly accept any such contribution.

1

During the course of our audit we determined that the Committee had received four (4) apparent corporate contributions totalling \$310 (see attached list). The corporate status of these business entities was confirmed with the Secretary of State's Office, San Juan, Puerto Rico, during the audit. The Treasurer stated he was unaware the Committee had accepted any corporate contributions, and felt these had been accepted due to clerical oversight.

Recommendation

We recommend that the Committee refund these contributions to the parties involved, and furnish documentary evidence of the refunds to the Audit staff, within 30 days of receipt of this letter.

D. Reporting of Committee Activity Under Candidate's Name

Sections 434(a)(1) and (b) of Title 2, United States Code, require political committees supporting candidate(s), and each candidate for election to Federal office to file with the Commission reports containing information on their receipts, expenditures, and beginning and ending cash.

During the course of our audit it was determined that the Committee's receipt and expenditure activity, except for \$50 in receipts, had been reported to the Commission on reports reflecting only the Candidate's name. In discussions with the Treasurer it was determined that the Candidate raised and spent no funds himself, and that all campaign-related activity occurred through the Committee. Information on Committee receipt and expenditure activity was sent to the Resident Commissioner's office in Washington where the FEC reports were prepared and filed under the Candidate's name.

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We recommended that the Committee and the Candidate submit comprehensive amendments for 1976 transferring all campaign activity from Candidate reports to reports properly reflecting the activity under the name of the Committee. On February 1, 1978, we received comprehensive amendments from the Candidate and the Committee correctly reflecting the transfer of receipt and expenditure activity totals from the Candidate to the Committee.

Recommendation

Because the Committee has satisfactorily complied with our recommendation, no further action on this finding will be recommended.

E. Reporting of Debts and Obligations

Section 434(b)(12) of Title 2, United States Code, states that reports filed by political committees shall disclose the amount and nature of debts and obligations owed by the committee; and requires that these debts and obligations be continuously reported until extinguished, together with a statement of circumstances under which they were extinguished.

Section 104.8(b) of Title 11, Code of Federal Regulations, requires in part, that a debt, obligation, or other promise to pay in excess of \$500 be reported as of the time of the transaction.

Our examination of Committee records revealed an obligation to the Committee's media firm which attained reportable status as of July 31, 1976, and which required continuous reporting through the year-end 1976 report, at which time the balance owed by the Committee was \$7,943.83. Since that time, the Committee has made no additional payments toward retiring this obligation. At no time during this period did the Committee or the Candidate disclose this obligation in its reports to the Commission. The Treasurer indicated this omission was due to a misunderstanding of the reporting requirements for obligations.

On February 1, 1978, the Committee filed a report (as of September 30, 1977) disclosing the obligation on the required Schedule C.

Recommendation

We further recommend that the Committee, within 30 days of receipt of this letter, file a comprehensive amendment for 1976 to include the appropriate Schedule C, disclosing the total obligation, payments to date, and balance outstanding on the above-mentioned obligation. Furthermore, the Committee is advised that it must continue to file reports until the debt is extinguished (in accordance with Section 434(b)(12) of Title 2 of the United States Code), and that any settlement of the obligation with the vendor at less than the value of the services is subject to Commission review, (per 11CFR 114.10(c)(3)).

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F. Itemization of Contributions

Section 434(b)(2) of Title 2, United States Code, requires a committee to include in its reports the full name and address, occupation and principal place of business of each person making a contribution(s) in excess or aggregating in excess of \$100 within a calendar year, together with the amount and date of such contribution(s).

Our review of the Committee's available receipt records revealed nine (9) contributions from as many contributors in excess of \$100 or aggregating in excess of \$100, which were not itemized by the Committee as required in its reports to the Commission. These contributions ranged in amount from \$50 to \$500 and totalled \$1,400. The Treasurer attributed these omissions to clerical oversight in the preparation of the reports.

In addition, of the 31 contributions itemized on the Candidate's reports:

- a) 3 contributions (9.67%) failed to reflect an address
- b) 11 contributions (35.48%) failed to reflect the individual's occupation
- c) 19 contributions (61.29%) failed to reflect the individual's principal place of business

We recommended that the Committee file a comprehensive amendment for 1976 itemizing the previously omitted contributions, and reflecting the missing address, occupation, and principal place of business information for those itemized contributions noted above. On February 1, 1978, we received the Committee's comprehensive amendment which materially complied with our recommendation.

Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

G. Reporting and Itemization of Expenditures

Section 434(b)(9) and (11) of Title 2, United States Code, requires that a committee disclose in its reports to the Commission the identification of each person to whom expenditures have been made by such committee within the calendar year in an aggregate amount in excess of \$100, the amount, date and purpose of each such expenditure; and, the total sum of expenditures made by such committee during the calendar year.

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During the course of the audit, our examination of the Committee's expenditures revealed 12 expenditures in excess of \$100 which the Committee neither itemized as required, nor included in its total expenditure figures as reported to the Commission. These 12 expenditures (36.36% of the total number of itemizable expenditures), ranged in amount from \$411 to \$3,000 and totalled \$13,146, or 35.13% of total itemizable expenditures. The Treasurer attributed these reporting omissions to a lack of co-ordination between the campaign office in San Juan and the Resident Commissioner's office in Washington where the FEC reports were prepared.

We recommended that the Committee file a 1976 comprehensive amendment itemizing these previously omitted expenditures, and adjusting its year-to-date totals accordingly. On February 1, 1978, the Committee filed its comprehensive amendment for 1976 including the expenditures noted above.

Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

H. Disclosure of Committee Depository

Section 433(b)(9) of Title 2, United States Code, requires that a committee reveal in its statement of organization a listing of all banks, safety deposit boxes, or other repositories used by the committee.

Our review of the Committee's bank records revealed the use of a depository which was not reported as required by the Committee on its Statement of Organization, in any amendments submitted thereto, nor on the Statement of Candidate. Furthermore, the depository disclosed by the Committee in its Statement of Organization was never used by the Committee during the period under audit.

Recommendation

We recommend that the Committee file an amended Statement of Organization disclosing the Committee's true depository within 30 days of receipt of this letter. We also recommend that the Candidate file an amended Statement of Candidacy designating the account as the Committee depository.

I. Disclosure of Fundraising Activity

Section 434(b)(6)(A) and (B) of Title 2, United States Code, requires that reports filed by committees under the Act shall disclose the total amount of proceeds from the sale of tickets to each dinner, rally, and other fundraising event, and mass collections made at such events.

80010224122

- 1 -

During the course of our audit, it was determined that a major fundraising banquet was held by the Committee in September 1976, at the Caribe Hilton, San Juan, which was not disclosed by the Committee on the required Schedule D. The Treasurer stated that a deposit made to the Committee's account on September 17, 1976, for \$12,410 represented the bulk of proceeds collected from the dinner.

We recommended that the Committee file its 1976 comprehensive amendment to include the appropriate Schedule D disclosing the total of proceeds from the fundraising activity referred to above. On February 1, 1978, the Committee filed its 1976 comprehensive amendment disclosing the fundraiser as recommended.

Recommendation

Because the Committee has complied in this matter, no further action will be recommended.

J. Filing of Reports in Non-Election Year

Sections 104.1(a), (c)(2) and (c)(3)(i) of Title 11, Code of Federal Regulations, require each political committee to file quarterly reports of contributions and expenditures (unless waived) until all debts and obligations relating to that committee's Federal election activity are extinguished, and the committee has filed a valid Notice of Termination. In any non-election year such committee shall only be required to file quarterly reports for a calendar quarter during which contributions received or expenditures made, when added together, exceed \$5,000. If the level of activity does not exceed \$5,000 per calendar quarter, the political committee shall notify the Commission on FEC Form 3a or by letter containing the same information at the close of the first quarter in which the exemption applies.

Our review of the Committee's reports filed with the Commission revealed no FEC Form 3a or letter equivalent filed by the Committee for the first quarter 1977. Bank records for the period indicated \$9.00 of expenditure activity and no receipt activity.

Recommendation

We recommend that the Committee file the omitted FEC Form 3a for the first quarter of 1977 within 30 days of receipt of this letter.

8001024123

K. Other Matters

Noted below is a matter for which the Audit staff feels no further action is required by the Committee:

Our examination of the Committee's solicitation literature, consisting of a mass mailing letter and a newspaper ad solicitation, revealed that neither contained the required notification as per Section 435(b) of Title 2 of the United States Code. The Committee was advised of the required notification for all solicitation literature in accordance with this section of the Act.

80010224124

ATTACHMENT I

COMITE AMIGOS DE JAIME BENITEZ
SCHEDULE OF APPARENT CORPORATE CONTRIBUTIONS

<u>CONTRIBUTOR</u>	<u>DATE</u>	<u>AMOUNT</u>	<u>DATE OF INCORPORATION</u>
1) Lube Construction Corp. Hato Rey, P.R.	6/76	\$ 40.00	1/16/69
2) Esteban Huertas, Inc. Box 792 Caguas, P.R.	6/76	20.00	3/2/73
3) Robert F. McCloskey Associates, Inc.	9/20/76	200.00	8/9/73
4) Underwear Corp. GPO Box 2947 San Juan, P.R. 00936 (listed under "Grana Corp." in Secretary of State's records)	8/26/76	50.00	11/17/64
	TOTAL	\$310.00	

90010224125



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. EMMONS *MJE*
DATE: NOVEMBER 22, 1978
SUBJECT: MUR 505 - Interim Conciliation Report
dated 11-20-78; Received in
OCS: 11-21-78, 10:08

The above-named document was circulated on a 24 hour no-objection basis at 3:30, November 21, 1978.

The Commission Secretary's Office has received no objections to the Interim Conciliation Report as of 4:00, this date.

90040224126

November 21, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 505

Please have the attached Interim Concil Report on
MUR 505 distributed to the Commission.

Thank you.

80010224127

RECEIVED
OFFICE OF THE
COMMISSIONER

BEFORE THE FEDERAL ELECTION COMMISSION

78 NOV 21 A10: 08

In the Matter of)
)
Comite Amigos de)
Jaime Benitez) MUR 505

Interim Conciliation Report

On August 21, 1978, the Commission took the following action regarding the Comite Amigos de Jaime Benitez ("the Committee"):

1. Found reasonable cause to believe that the Committee failed to adequately report and keep records for receipts as set forth in 2 U.S.C. § 432(c) (1) and (2), and § 434(b) (2)-(8).
2. Found reasonable cause to believe that the Committee accepted illegal corporate contributions prohibited by 2 U.S.C. § 441b(a).
3. Found reasonable cause to believe that the Committee failed to disclose the Committee depository as required by 2 U.S.C. § 433(b) (9).
4. Found reasonable cause to believe that the Committee failed to include the required notification for solicitation literature as set forth in 2 U.S.C. § 435(b).
5. Found reasonable cause to believe that the Committee failed to file the 1977 Year End Report and April 10, 1978 Quarterly Report as set forth in 2 U.S.C. § 434(a) (1).

Upon notification of the findings and receipt of the Conciliation Agreement, the Committee Treasurer contacted the Office of General Counsel regarding efforts to conciliate. Subsequently, the Committee submitted the following documents:

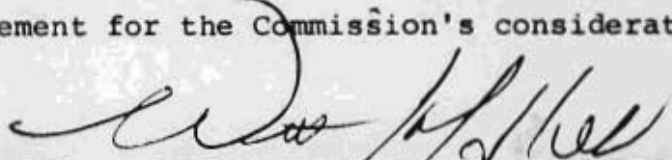
3004024128

- a. Reports covering Year End 1977, April 10, 1978, and July 10, 1978.
- b. Copies of refund checks issued to each corporate contributor.
- c. Amended statement of organization disclosing the Committee's campaign depository.

On October 12, 1978, the Committee Treasurer met with the General Counsel's staff to discuss the conciliation. At that meeting, we outlined a timetable for speedy resolution of the remaining matters. Subsequent telephone calls from Puerto Rico confirmed the Treasurer's efforts to comply. The Treasurer insisted that he has been unable to obtain the required receipts records from the Candidate's home as the former Congressman has been away from Puerto Rico for several weeks. Mr. Benitez called while in Washington (10-27-78) to offer his assistance. He indicated that the Treasurer has now been authorized to obtain the documents from his office records.

The Committee is arranging a fundraiser to repay the Candidate's 1976 outstanding debt. The event, a dinner dance, is tentatively scheduled for the first or second week in November, when Mr. Benitez returns to Puerto Rico. When a debt settlement is approved, the Committee hopes to terminate its reporting responsibilities. In addition, the Committee has indicated its intentions to offer a counterproposal to the Conciliation Agreement for the Commission's consideration.

11/20/78
Date



William C. Oldaker
General Counsel

30010324129

FEDERAL ELECTION COMMISSION

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

POSTAGE AND FEES PAID



REASON CHECKED
UNCLAIMED

Honorable Jaime Benitez
Condominio Del Mar #50
Condado, Puerto Rico

Noted

CERTIFIED

943798

1st Notice NOV 2 1978
2nd Notice NOV 9 1978
Return _____

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0001022413

PS Form 3811, April 1977
Check Complete items 1, 5, and 6
Add your address in the "RETURN TO" space on
reverse.

1. THE FOLLOWING SERVICE IS REQUESTED (check one):

SHOW TO WHOM AND DATE DELIVERED..... 6

SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY..... 6

RESTRICTED DELIVERY
Show to whom and date delivered..... 6

RESTRICTED DELIVERY
Show to whom, date, and address of delivery. 8
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ASSIGNED TO:

Mr. Jaime Benitez

3. ARTICLE DESCRIPTION:

REGISTERED NO. | CERTIFIED NO. | INSURED NO.

719199

(Always attach signature of addressee or agent)

I have received the article described above.

SIGNATURE *J. Benitez* Addressee Authorized agent

4. DATE OF DELIVERY: *6/26/77* POSTMARK

5. ADDRESS: *6667*

6. UNPAID FEE

7. CLEVER'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

PS Form 3811-0-77





FEDERAL ELECTION COMMISSION

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

October 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Jaime Benitez
Condominio del Mar #50
Condado, Puerto Rico

Re: MUR 505

Dear Hon. Benitez:

Pursuant to the request of Mr. Jose Alegria in regard to the above referenced matter, we are enclosing for your information copies of the letters and conciliation agreements sent to the Comite Amigos de Jaime Benitez.

If you have any questions regarding this matter, please contact Frances B. Hagan, the staff member assigned to this matter at 202-523-4006.

Sincerely,

William C. Oldaker
General Counsel

Encs. - 2 letters
- 2 conc. agree.

80040024132



FEDERAL ELECTION COMMISSION

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

August 28, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jose E. Alegria
Comite Amigos de Jaime Benitez
75 Condada Avenue
Santurce, Puerto Rico 00907

Re: MUR 505

Dear Mr. Alegria:

On August 21, 1978, the Commission determined there was reasonable cause to believe that your committee violated the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the Comite Amigos de Jaime Benitez is in violation of:

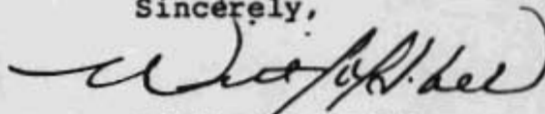
- (A) 2 U.S.C. § 432(c) (1) and (2) and 2 U.S.C. § 434 (b) (2)-(8) for failing to adequately report and keep records of receipts;
- (B) 2 U.S.C. § 441b(a) for accepting illegal corporate contributions;
- (C) 2 U.S.C. § 433(b) (9) for failing to properly disclose the Committee depository;
- (D) 2 U.S.C. § 435(b) for failing to include the required notification on the Committee's solicitation literature;
- (E) 2 U.S.C. § 434(a) (1) for failing to file the 1977 Year End Report, April 10 and July 10, 1978, Quarterly Reports.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. § 437g(a) (5) (A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Fran Hagan, staff member assigned to this matter, at 202-523-4006 within ten days.

Sincerely,



William C. Oldaker
General Counsel

Enclosure

2025 RELEASE UNDER E.O. 14176

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Comite Amigos)
de Jaime Benitez) MUR 505 (78)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (the Commission) on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Commission found reasonable cause to believe that Respondent, Comite Amigos de Jaime Benitez (the Committee), violated the Federal Election Campaign Act ("the Act") as follows:

- A. failed to adequately report and keep records of receipts as set forth in 2 U.S.C. §432(c)(1), (2), and §434(b)(2)-(8);
- B. accepted illegal corporate contributions prohibited by 2 U.S.C. §441b(a);
- C. failed to disclose the Committee depository as required by 2 U.S.C. §433(b)(9);
- D. failed to include the required notification for solicitation literature as set forth in 2 U.S.C. §435(b); and
- E. failed to file the 1977 Year-End Report and April 10, 1978, Quarterly Report as set forth in 2 U.S.C. §434(a)(1).

Now therefore, the respective parties herein, the Commission and respondent Committee, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

- I. That the Federal Election Commission has jurisdiction over respondent Committee and the subject matter of this proceeding.

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II. That respondent Committee has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. That the pertinent facts of this matter are as follows:

- A. Respondent Committee is the principal campaign committee of Jaime Benitez, a candidate for the Resident Commissioner for Puerto Rico, whose name appeared on the November 2, 1976, general election ballot.
- B. Respondent Committee failed to keep records to identify the source of campaign receipts as required by 2 U.S.C. §432 (c) (1) and (2).
- C. Respondent Committee failed to report campaign receipts totaling \$18,088.28 (47.8% of the total reportable receipts) in its original reports in violation of 2 U.S.C. §434(b) (2)-(8). The receipts were included with amended 1976 reports filed on February 1, 1978.
- D. Respondent Committee accepted four corporate contributions totaling \$310.00 in violation of 2 U.S.C. §441b(a). Despite recommendations by Commission auditors and notices from the Commission, the respondent Committee has failed to show evidence that the contributions have been refunded.
- E. Respondent Committee failed to disclose the Committee depository as required by 2 U.S.C. §433(b) (9).
- F. Respondent Committee failed to include the required notification for solicitation literature as set forth in 2 U.S.C. §435(b).

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G. Despite having received Commission notices regarding reporting responsibilities, respondent Committee failed to file the 1977 Year End Report, the April 10, 1978 Report, and the July 10, 1978 Report in violation of 2 U.S.C. §434(a)(1).

WHEREFORE, respondent Committee agrees that:

- I. Failure of respondent Committee to maintain receipt records constitutes a violation of 2 U.S.C. §432(c)(1) and (2).
- II. Failure to report campaign receipts constitutes a violation of 2 U.S.C. §434(b)(2)-(8).
- III. Acceptance of corporate contributions in connection with a Federal election constitutes a violation of 2 U.S.C. §441b(a).
- IV. Failure to disclose a campaign depository constitutes a violation of 2 U.S.C. §433(b)(9).
- V. Failure to include the required notification for solicitation literature constitutes a violation of 2 U.S.C. §435(b).
- VI. Failure to file required reports of receipts and expenditures constitutes a violation of 2 U.S.C. §434(a)(1).
- VII. Respondent Committee will comply with the following recommendations:
 - 1) Provide documentation to identify the source of unsupported receipts.
 - 2) File a supplementary 1976 comprehensive amendment to itemize where necessary the undocumented receipts in (1) above.
 - 3) Refund the corporate contributions.

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- ✓4) Disclose the Committee campaign depository on an amended statement of organization.
- 5) Include the required notification on all future solicitation literature.
- ✓6) File the required reports of receipts and expenditures for ✓Year End 1977 and ✓1978 Quarterly Reports and continue to file until all debts and obligations are extinguished.

VIII. Respondent Committee will pay a civil penalty in the amount of \$3500 to the United States Treasury pursuant to 2 U.S.C. §437g(a)(5)(B).

GENERAL CONDITIONS

- I. The Commission, upon request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue therein, 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.
- II. It is mutually agreed that this agreement shall become effective as to the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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III. It is agreed that respondent Committee shall have thirty (30) days from the date this agreement becomes effective to comply with and to implement the requirements contained in this agreement and to so notify the Commission.

Date

FOR THE RESPONDENT
COMITE AMIGOS DE JAIME
BENITEZ

Date

William C. Oldaker
General Counsel

90010224139



FEDERAL ELECTION COMMISSION

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

April 13, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jose E. Alegria
Comite Amigos de Jaime Benitez
75 Condado Avenue
Santurce, Puerto Rico 00907

Re: MUR 505 (78)

Dear Mr. Alegria:

On November 25, 1977, the Federal Election Commission (the Commission) found reasonable cause to believe that the Committee Amigos de Jaime Benitez (the Committee) had violated 2 U.S.C. §434 by failing to file the 1977 required reports.

On January 16, 1978, the Committee was referred to the Office of General Counsel for further review.

On February 1, 1978, the Commission received 1976 and 1977 amended reports that you filed on behalf of the Committee. Although these reports satisfy your reporting requirements for the period of January 1, 1977 through September 30, 1977, they were due as of January 31, 1977, April 10, 1977, and October 10, 1977, respectively. They were not filed until January 31, 1978. Therefore, the Committee was late in fulfilling its reporting obligations and is considered to have been in violation of 2 U.S.C. §434(a)(1).

The Commission is required to endeavor for a period of not less than 30 days to correct such violation and to enter into a conciliation agreement as set forth in 2 U.S.C. §437g(a)(5)(A).

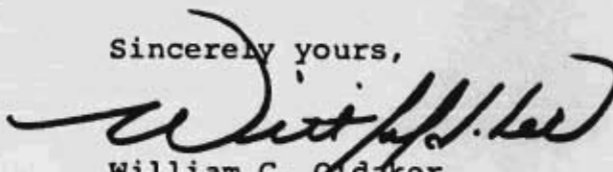
Attached you will find a conciliation agreement this office would propose for the Committee. If you find the proposed conciliation agreement acceptable, please sign on behalf of the Committee, and return to the Commission within 30 days of receipt of this letter. However, we would arrange a meeting to discuss the proposed conciliation agreement if you are not in accord with its substance. Accordingly, we request that you respond within ten (10) days of receipt of this letter so that we may have ample

time to conclude the conciliation period within the required 30 day limit.

Please note that this proposed conciliation agreement refers only to the Committee's reporting obligations. We are aware that the Commission's Audit Division has found various violations within the Committee's records during an extensive audit of the Committee in November, 1977. This may warrant further investigations by the Office of General Counsel at a later date if you do not respond adequately to the requests made by the Audit Division.

If you have any questions, please contact Ellen L. Hughes (telephone no. 202/523-4026), the staff member assigned to this matter.

Sincerely yours,



William C. Oldaker
General Counsel

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

March 30 , 1978

In the Matter of)
Non-Filer/Comite Amigos) MUR 505 (78)
De Jaime Benitez)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (the Commission) on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation was conducted, and the Commission found reasonable cause to believe that Respondent, Comite Amigos De Jaime Benitez (the Committee), violated 2 U.S.C. §434.

Now therefore, the respective parties herein, the Commission and respondent Committee, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over respondent Committee and the subject matter of this proceeding.

II. That respondent Committee has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. That the pertinent facts of this matter are as follows:

A. Respondent Committee is the principal campaign committee of Jaime Benitez, a candidate for the U.S. House of Representatives

80010224112

for Puerto Rico, whose name appeared on the November 2, 1976, general election ballot.

B. Despite having received notices from the Commission informing respondent Committee of its 1977 quarterly reporting obligations, respondent Committee had failed to file timely reports as set forth in 2 U.S.C. §434(a)(1).

C. On February 1, 1978, respondent Committee filed 1976 and 1977 amended reports with the Commission.

Wherefore, respondent Committee agrees:

I. That regardless of respondent Committee's late filing of the 1977 amended report, the Commission construes that respondent Committee was in violation of 2 U.S.C §434.

II. Respondent Committee will pay a civil penalty in the amount of one thousand dollars (\$1,000) pursuant to 2 U.S.C. §437(a)(6)(B).

III. Respondent Committee will continue to file quarterly reports until all debts and obligations are extinguished, together with a statement as to the circumstances and conditions under which any such debt or obligation is extinguished as set forth in 2 U.S.C. §434(b)(12).

GENERAL CONDITIONS

I. The Commission, upon request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue therein, 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.

80010221143

II. It is mutually agreed that this agreement shall become effective as to the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that respondent Committee shall have 30 days from the date this agreement becomes effective to comply with and to implement the requirements contained in this agreement and to so notify the Commission.

DATE

FOR THE RESPONDENT
COMITE AMIGOS JAIME DE
BENITEZ

DATE

WILLIAM C. OLDAKER
GENERAL COUNSEL

30010224144



FEDERAL ELECTION COMMISSION

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

October 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Jaime Benitez
Condominio del Mar #50
Condado, Puerto Rico

Re: MUR 505

Dear Hon. Benitez:

Pursuant to the request of Mr. Jose Alegria in regard to the above referenced matter, we are enclosing for your information copies of the letters and conciliation agreements sent to the Comite Amigos de Jaime Benitez.

If you have any questions regarding this matter, please contact Frances B. Hagan, the staff member assigned to this matter at 202-523-4006.

Sincerely,

William C. Oldaker
General Counsel

Encs. - 2 letters
- 2 conc. agree.

90040224115



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: SEPTEMBER 26, 1978
SUBJECT: MUR 505 - Interim Status Report dated
9-22-78; Received in OCS
9-22-78, 2:33

The above-named document was circulated on a 24 hour no-objection basis at 10:00 a.m., September 25, 1978.

The Commission Secretary's Office has received no objections to the Interim Status Report as of 11:30 this date.

30010324146

September 22, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 505

Please have the attached Interim Status Report
on MUR 505 distributed to the Commission.

Thank you.

9001024117

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Comite Amigos de
Jaime Benitez

)
)
)
)

MUR 505

INTERIM STATUS REPORT

On August 21, 1978, the Commission took the following action regarding the Comite Amigos de Jaime Benitez ("the Committee"):

1. Found reasonable cause to believe that the Committee failed to adequately report and keep records for receipts as set forth in 2 U.S.C. §432(c)(1) and (2), and §434(b)(2)-(8).
2. Found reasonable cause to believe that the Committee accepted illegal corporate contributions prohibited by 2 U.S.C. §441b(a).
3. Found reasonable cause to believe that the Committee failed to disclose the Committee depository as required by 2 U.S.C. §433(b)(9).
4. Found reasonable cause to believe that the Committee failed to include the required notification for solicitation literature as set forth in 2 U.S.C. §435(b).
5. Found reasonable cause to believe that the Committee failed to file the 1977 Year End Report and April 10, 1978 Quarterly Report as set forth in 2 U.S.C. §434(a)(1).

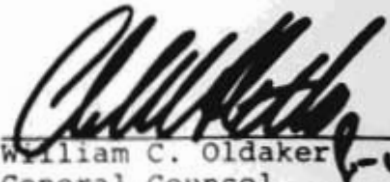
Upon notification of the findings and receipt of the Conciliation Agreement, the Committee Treasurer contacted the Office of General Counsel regarding efforts to conciliate. Subsequently, the Committee submitted the following documents:

- a. Reports covering Year End 1977, April, 10, 1978, and July 10, 1978.
- b. Copies of refund checks issued to each corporate contributor.
- c. Amended statement of organization disclosing the Committee's campaign depository.

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In addition, the Treasurer has requested a meeting with staff members of the Office of General Counsel and Audit Division while on business in the U.S. during the week of September 25, 1978. He hopes at that time to present documents which fulfill reporting and recordkeeping requirements for receipts.

22 Sept 1978
Date


William C. Oldaker
General Counsel

80010224119



78 SEP 13 AM 12:09

September 13, 1978

806285

Ms. Fran Hagan
Federal Election Commission
1325 K Street N. W.
Washington, D.C. - 20463

Dear Fran:

Please be advised that Comité Amigos de Jaime Benítez hereby certifies that the Comité Amigos de Jaime Benítez has an outstanding debt of \$7,943.83 to Monique Lacombe Advertising and deposits in the bank of \$79.71 as of September 13, 1978.

If you have any questions, please contact me immediately.

Sincerely yours,

José E. Alegría
Treasurer
Comité Amigos de Jaime Benítez

JEA/rcp

80010224150

COMITE AMIGOS DE
JAIME BENITEZ

BANCO de San Juan
SANTURCE, P. R.

032

PAY TO THE
ORDER OF

Tube Construction Corp.

Sept. 13 1978

101.205
215

\$ 40.00

Forty

00/100 DOLLARS

FOR reimbursement for
corporate donation # 15 0 20 51

Jose E. Alegria
15 1 0 26

COMITE AMIGOS DE
JAIME BENITEZ

BANCO de San Juan
SANTURCE, P. R.

033

PAY TO THE
ORDER OF

Esteban Huertas Inc.

Sept. 13 1978

101.205
215

\$ 20.00

Twenty

00/100 DOLLARS

FOR reimbursement for
corporate donation # 15 0 20 51

Jose E. Alegria
15 1 0 26

COMITE AMIGOS DE
JAIME BENITEZ

BANCO de San Juan
SANTURCE, P. R.

034

PAY TO THE
ORDER OF

Underwear Corporation

Sept. 13 1978

101.205
215

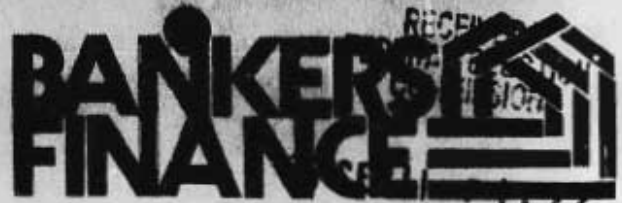
\$ 50.00

Fifty

00/100 DOLLARS

FOR reimbursement for
corporate donation # 15 0 20 51

Jose E. Alegria
15 1 0 26



805076
GCC# 4836

September 7, 1978

Ms. Fran Hagan
Federal Election Commission
1325 K Street N. W.
Washington, D.C. - 20463

Dear Fran:

I hereby certify that Banco de San Juan was and is the only depository bank used by Comité Amigos de Jaime Benítez for the entire political campaign.

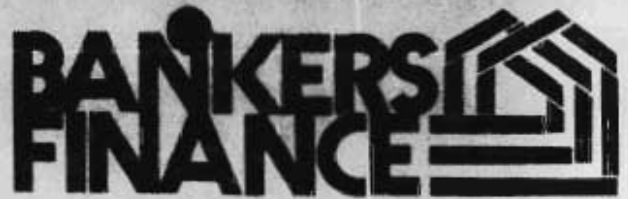
If you have any questions, please don't hesitate to contact me.

Sincerely yours,

José E. Alegria
José E. Alegria

JEA/rcp

80010024152



September 7, 1978

Ms. Fran Hagan
Federal Election Commission
1325 K Street N. W.
Washington, D.C. - 20463

Dear Fran:

Please be advised that Comité Amigos de Jaime Benítez hereby certifies that as of July 10th at 1978 the committee had "0" receipts and "0" expenditures.

However the Comité Amigos de Jaime Benítez has an outstanding debt of \$7,943.83 and deposits in the bank of \$189.71 as of August 31, 1978.

If you have any questions, please contact me immediately.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "José E. Alegría".

José E. Alegría
Treasurer
Comité Amigos de Jaime Benítez

JEA/rcp

80040024153



September 7, 1978

Ms. Fran Hagan
Federal Election Commission
1325 K Street N. W.
Washington, D.C. - 20463

Dear Fran:

Please be advised that Comité Amigos de Jaime Benítez hereby certifies that as of December 31st. at 1977 the committee had "0" receipts and "0" expenditures.

However the Comité Amigos de Jaime Benítez has an outstanding debt of \$7,943.83 and deposits in the bank of \$189.71 as of August 31st. 1978.

Also be advised that the corporate checks were return to the company and replaced by a personal one. Enclosed you will find a photocopy of it.

If you have any questions, please contact me immediately.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "José E. Alegría".

José E. Alegría
Treasurer
Comité Amigos de Jaime Benítez

JEA/rcp

Encls.

80040224154



September 7, 1978

Ms. Fran Hagan
Federal Election Commission
1325 K Street N. W.
Washington, D.C. - 20463

Dear Fran:

Please be advised that Comité Amigos de Jaime Benítez hereby certifies that as of April 10th, 1978 the committee had "0" receipts and "0" expenditures.

However the Comité Amigos de Jaime Benítez has an outstanding debt of \$7,943.83 and deposits in the bank of \$189.71 as of August 31, 1978.

If you have any questions, please contact me immediately.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "José E. Alegría".

José E. Alegría
Treasurer
Comité Amigos de Jaime Benítez

JEA/rcp

80040224155

BANCO de San Juan

SANTO DOMINGO

- SAN JUAN
- SAN JUAN
- CATAÑO
- COUNTRY CLUB
- SAN JUAN CENTER
- SAN JOSE
- RIO PIEDRA
- VILLA PALMERAS
- BAYAMON
- CAJULAS
- LEWISTOWN
- PUERTO RICO
- LUIS AND ANNE'S
- SEAFRONT SHOPPING CENTER
- ARECIBO

COMITE AMIGOS DE JAIPE BENITEZ
 1370 MADALENS ST.
 APT. 2-11
 SANTURCE, P.R. 00927

ACCOUNT NO.
 1751-02A
 05/31/74
 LEDGER AS OF

FAVOR DE REVISAR SU CUENTA INMEDIATAMENTE. SI EN 10 DIAS NO SE REPORTAN ERRORES SU CUENTA SERA CONSIDERADA CORRECTA.
 PLEASE EXAMINE YOUR STATEMENT IMMEDIATELY. IF NO ERRORS ARE REPORTED IN 10 DAYS THE ACCOUNT WILL BE CONSIDERED CORRECT.

800010221156

CHECKS AND OTHER DEBITS		DEBITS AND OTHER CREDITS		DATE	BALANCE
NO.	AMOUNT	NO.	AMOUNT	MO. DAY	
				11	20141
	30000			05	141
			30000	05	20141
	30000			05	10041

1	20141	1	30000	1	30000		10041
---	-------	---	-------	---	-------	--	-------

CM - MITALES MENSAJES | EC - PAGOS CORREGIDOS | RT - DEPOSITOS | OD - SOBREGIRO | TF - TRANSFERENCIA LINEA CR
 DM - MENS DE DEBITO | CC - CHEQUE CERTIFICADO | SC - CARGOS POR SERVICIO | XX - TOTAL DE LINEA | PG - PAGO A LINEA CREDITO
 CAJAS DE DEBITO

USE LA FORMA ANEXADA AL BORSO PARA CUADRAR SU CUENTA

80010221158

BANCO de San Juan
SANTURCE, P. R.

031

COMITE AMIGOS DE
JAIME BENITEZ

PAY TO THE
ORDER OF

Robert F. McCluskey

May 1 1978

101 205
215

\$ 200.00

Two hundred

00/100 DOLLARS

FOR *Reimbursement of expense*
Contribution

⑆0215⑆0205⑆

⑆751⑆026⑆

⑆0000020000⑆

BANCO DE SAN JUAN
Jose E. Alvarez

30010221139

DEPOSITADO CON
DEPOSITED WITH

1970894 **BANCO DE SAN JUAN**

EL RECEPTOR VERIFICARA SOLAMENTE EL EFECTIVO
THE TELLER WILL VERIFY THE CASH ONLY.

FECHA/DATE _____ OFICINA/BRANCH _____

PARA ACREDITARSE A:
FOR ACCOUNT OF:

DIRECCION:
ADDRESS:



SI DEPOSITA CHEQUES,
ASEGURESE DE:

1. ENDOSAR CADA CHEQUE INCLUYENDO SU NUMERO CUENTA.
2. DETALLARLOS EN EL DEPOSITO A COMPARTIR NUMERO DE LOS MISMOS.

IF CHECKS ARE DEPOSITED
BE SURE TO:

1. ENDORSE EACH CHECK INCLUDING YOUR ACCOUNT NUMBER.
2. LIST THEM ON DEPOSIT OR ATTACH A RUN-UP TAPE.

EFFECTIVO CASH	CHEQUES CHECKS
	200.00
1	
2	
3	
4	
5	
6	
7	
TOTAL \$ 200.00	

LOS DEPOSITOS SE RECIBEN BAJO LAS CONDICIONES DEL CONTRATO INDICADAS AL DORSO. DEPOSITORS ARE RECEIVERS SUBJECT TO THE CONDITIONS INDICATED ON THE CONTRACT OR ON BACK HEREOF.

Account number input fields: [] [] [] [] - [] [] [] []

CA-1 CUENTA NUMERO
REV. 1-72 ACCOUNT NUMBER



BANCO
SANTO DOMINGO

de San Juan

- SAN JUAN
- SAN PEDRO
- CAYAMA
- COUNTRY CLUB
- BROWNS CENTER
- SAN JOSE
- BELLEVILLE
- VILLA PARADISE

- BAYAMON
- CAJUPAY
- GUAYAMA
- PUEBLO RICO
- LAS ANAS BRUNELL
- BROWNS SHOPPING CENTER
- RECTOR

COMITE MIEMBROS DE JAMES DOMESTO
1370 MARGARITA ST.
APT. 2-11
SANTO DOMINGO, D.R. 10007

ACCOUNT NO.
1751-024
12/31/79
10007

EXAMINE YOUR STATEMENT IMMEDIATELY IF NO ERRORS ARE REPORTED WITHIN TEN DAYS THE ACCOUNT WILL BE CONSIDERED CORRECT

CHECKS AND OTHER DEBITS	DEPOSIT AND OTHER CREDITS		DATE		BALANCE
	NO.	AMOUNT	MO.	DAY	
			11	27	22141
			12	20	131
			12	11	22141
			12	31	19941

0916001008

PAGE NO	ENDING BALANCE	NO. OF CHECKS	AMOUNT OF DEBITS	NO. OF CREDITS	AMOUNT OF CREDITS	ENDING BALANCE
1	22141	1	22200	1	22000	19941

CM - CHECKS
DM - DEBIT MESSAGES
BC - BANK OF CAYAMA
CC - COUNTRY CLUB
RT - REALTY
SC - SANTIAGO
OD - OTHER DEBITS
XX - OTHER CREDITS
TF - TRANSFER FROM OTHER
PG - PUEBLO RICO

COMPAN...
 DAN...
 AM...
 IF YOU... PLEASE... RECEIPT... LAST

ROBERT F. MC CLOSKEY

REAL ESTATE APPRAISER

TELE 751-4014 - 753-2333

P. O. BOX 10037

CAPARRA HEIGHTS STA., SAN JUAN, P.R. 00922

570

5-6 19 78 ^{101.201}/₂₁₅

PAY TO THE ORDER OF COMITE AMIGOS DE JAIME BENITEZ \$ 200.00
Two Hundred and 00/100 DOLLARS



BANCO POPULAR DE PUERTO RICO
 SAN JUAN, PUERTO RICO

ROBERT F. MC CLOSKEY
[Signature]

BANCO de San Juan
 SANTURCE, P. R. 031

101.205
 215

MAY 1 1978

PAY TO THE ORDER OF Robert F. McCloskey \$ 200.00
Two Hundred ⁰⁰/₁₀₀ DOLLARS

FOR Reimbursement of corporate contribution
Jose L. Abizua
 BANCO DE SAN JUAN
 021502050 07560260 0000020000

COMITE AMIGOS DE JAIME BENITEZ

DEPOSITADO CON DEPOSITED WITH

1970034 **BANCO DE SAN JUAN**

EL RECEPTOR VERIFICARA SOLAMENTE EL EFECTIVO. THE TELLER WILL VERIFY THE CASH ONLY.

FECHA/DATE: _____ OFICINA/BRANCH: _____

PARA ACREDITARSE A: FOR ACCOUNT OF: _____

DIRECCION: ADDRESS: _____

SI DEPONTA ADELANTE DE: IF CHECKS ARE DEPOSITED BE SURE TO: _____

1. ERRORES EN LA CHEQUE INCLUYENDO SU NUMERO CUENTA. 2. DETALLADOS EN EL REPORTE ACOMPAÑAR / OMI DE SU MISMO. 3. LIST THEM ON DEPOSIT OR ATTACH A RUN-UP TAPE.

EFFECTIVO CASH	CHEQUES CHECKS
	200.00
TOTAL	200.00

LOS DEPÓSITOS SE RECIBEN BAJO LAS CONDICIONES QUE SE ENCONTRAN EN EL REPORTE QUE SE RECIBIÓ SUJETO A LAS CONDICIONES INDICADAS EN EL CONTRATO EN EL REVERSO.

CA-1 CUENTA NUMERO REV. 1-72 ACCOUNT NUMBER





FEDERAL ELECTION COMMISSION

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

August 28, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jose E. Alegria
Comite Amigos de Jaime Benitez
75 Condada Avenue
Santurce, Puerto Rico 00907

Re: MUR 505

Dear Mr. Alegria:

On August 21, 1978, the Commission determined there was reasonable cause to believe that your committee violated the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the Comite Amigos de Jaime Benitez is in violation of:

- (A) 2 U.S.C. § 432(c) (1) and (2) and 2 U.S.C. § 434 (b) (2)-(8) for failing to adequately report and keep records of receipts;
- (B) 2 U.S.C. § 441b(a) for accepting illegal corporate contributions;
- (C) 2 U.S.C. § 433(b) (9) for failing to properly disclose the Committee depository;
- (D) 2 U.S.C. § 435(b) for failing to include the required notification on the Committee's solicitation literature;
- (E) 2 U.S.C. § 434(a) (1) for failing to file the 1977 Year End Report, April 10 and July 10, 1978, Quarterly Reports.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. § 437g(a) (5) (A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Fran Hagan, staff member assigned to this matter, at 202-523-4006 within ten days.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

8071234163

REGISTERED MAIL - REGISTERED, INSURED AND CERTIFIED MAIL

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
 Jack P. ...
 ...

3. ARTICLE DESCRIPTIONS
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 43708

(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: [unclear]

6. UNABLE TO DELIVER BECAUSE

POSTMARK: AUG 1 1961

CLERK'S INITIALS: [unclear]

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Comite Amigos)
de Jaime Benitez) MUR 505 (78)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (the Commission) on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Commission found reasonable cause to believe that Respondent, Comite Amigos de Jaime Benitez (the Committee), violated the Federal Election Campaign Act ("the Act") as follows:

- A. failed to adequately report and keep records of receipts as set forth in 2 U.S.C. §432(c)(1), (2), and §434(b)(2)-(8);
- B. accepted illegal corporate contributions prohibited by 2 U.S.C. §441b(a);
- C. failed to disclose the Committee depository as required by 2 U.S.C. §433(b)(9);
- D. failed to include the required notification for solicitation literature as set forth in 2 U.S.C. §435(b); and
- E. failed to file the 1977 Year-End Report and April 10, 1978, Quarterly Report as set forth in 2 U.S.C. §434(a)(1).

Now therefore, the respective parties herein, the Commission and respondent Committee, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

- I. That the Federal Election Commission has jurisdiction over respondent Committee and the subject matter of this proceeding.

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II. That respondent Committee has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. That the pertinent facts of this matter are as follows:

- A. Respondent Committee is the principal campaign committee of Jaime Benitez, a candidate for the Resident Commissioner for Puerto Rico, whose name appeared on the November 2, 1976, general election ballot.
- B. Respondent Committee failed to keep records to identify the source of campaign receipts as required by 2 U.S.C. §432 (c)(1) and (2).
- C. Respondent Committee failed to report campaign receipts totaling \$18,088.28 (47.8% of the total reportable receipts) in its original reports in violation of 2 U.S.C. §434(b)(2)-(8). The receipts were included with amended 1976 reports filed on February 1, 1978.
- D. Respondent Committee accepted four corporate contributions totaling \$310.00 in violation of 2 U.S.C. §441b(a). Despite recommendations by Commission auditors and notices from the Commission, the respondent Committee has failed to show evidence that the contributions have been refunded.
- E. Respondent Committee failed to disclose the Committee depository as required by 2 U.S.C. §433(b)(9).
- F. Respondent Committee failed to include the required notification for solicitation literature as set forth in 2 U.S.C. §435(b).

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G. Despite having received Commission notices regarding reporting responsibilities, respondent Committee failed to file the 1977 Year End Report, the April 10, 1978 Report, and the July 10, 1978 Report in violation of 2 U.S.C. §434(a)(1).

WHEREFORE, respondent Committee agrees that:

- I. Failure of respondent Committee to maintain receipt records constitutes a violation of 2 U.S.C. §432(c)(1) and (2).
- II. Failure to report campaign receipts constitutes a violation of 2 U.S.C. §434(b)(2)-(8).
- III. Acceptance of corporate contributions in connection with a Federal election constitutes a violation of 2 U.S.C. §441b(a).
- IV. Failure to disclose a campaign depository constitutes a violation of 2 U.S.C. §433(b)(9).
- V. Failure to include the required notification for solicitation literature constitutes a violation of 2 U.S.C. §435(b).
- VI. Failure to file required reports of receipts and expenditures constitutes a violation of 2 U.S.C. §434(a)(1).
- VII. Respondent Committee will comply with the following recommendations:
 - 1) Provide documentation to identify the source of unsupported receipts.
 - 2) File a supplementary 1976 comprehensive amendment to itemize where necessary the undocumented receipts in (1) above.
 - 3) Refund the corporate contributions.

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- 4) Disclose the Committee campaign depository on an amended statement of organization.
- 5) Include the required notification on all future solicitation literature. .
- 6) File the required reports of receipts and expenditures for Year End 1977 and 1978 Quarterly Reports and continue to file until all debts and obligations are extinguished.

VIII. Respondent Committee will pay a civil penalty in the amount of \$3500 to the United States Treasury pursuant to 2 U.S.C. §437g(a) (5) (B).

GENERAL CONDITIONS

- I. The Commission, upon request of anyone filing a complaint under 2 U.S.C. §437g(a) (1) concerning the matters at issue therein, 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.
- II. It is mutually agreed that this agreement shall become effective as to the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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III. It is agreed that respondent Committee shall have thirty (30) days from the date this agreement becomes effective to comply with and to implement the requirements contained in this agreement and to so notify the Commission.

80040224158
Date _____

FOR THE RESPONDENT
COMITE AMIGOS DE JAIME
BENITEZ

Date _____

William C. Oldaker
General Counsel

CERTIFICATION
MUR 505 (78)
General Counsel's Report
Dated: 8-17-78

PAGE 2

6. Send the letter and conciliation agreement attached to the General Counsel's Report dated August 17, 1978.

Voting for these determinations were Commissioners Harris, Aikens, Tiernan, Staebler, and Thomson.

ATTEST:

8/21/78
DATE

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 8-17-78, 11:16
Circulated on 48 hour vote basis: 8-17-78, 3:30

80040224170

August 17, 1978

MEMOANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 505

Please have the attached General Counsel's Report on MUR 505 distributed to the Commission on a 48 hour tally basis.

Thank you.

30010224171

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Comite Amigos de) MUR 505(78)
Jaime Benitez)

GENERAL COUNSEL'S REPORT

On November 25, 1977, the Commission found reasonable cause to believe that the Comite Amigos de Jaime Benitez ("the Committee") violated 2 U.S.C. §434(a)(1) of the Federal Election Campaign Act ("the Act") for failure to file 1977 Quarterly Reports. The appropriate reports were filed on February 1, 1978. On April 12, 1978, the Commission approved the General Counsel's recommendations to send a letter and conciliation agreement to the Committee. To date, no response to the conciliation agreement has been received.

On June 1, 1978, the Commission found reason to believe that the Committee further violated the Act as follows:

- A. failed to adequately report and keep records of receipts as set forth in 2 U.S.C. §432(c)(1), (2), and §434(b)(2)-(8);
- B. accepted illegal corporate contributions prohibited by 2 U.S.C. §441b(a);
- C. failed to disclose the Committee depository as required by 2 U.S.C. §433(b)(9);
- D. failed to include the required notification for solicitation literature as set forth in 2 U.S.C. §435(b); and
- E. failed to file the 1977 Year-End Report and April 10, 1978, Quarterly Report as set forth in 2 U.S.C. §434(a)(1). In addition, on August 9, 1978, the Commission found reasonable cause to believe that this violation had occurred regarding the July 10 Report. This issue is covered in paragraph III, G. of the attached conciliation agreement.

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USA 11/25

The basis for these findings - discovered during a routine audit of the Committee - are contained in the attached audit report. The itemizations of corporate contributions are included as Attachment I.

The Committee received a notification letter of the findings on June 16, 1978, and was due to respond by July 7, 1978. To date, this Office has received no response. The Committee's having therefore had a reasonable opportunity to demonstrate that no action should be taken against it, the Office of General Counsel is recommending that the Commission find reasonable cause to believe against the Committee. In the event conciliation efforts should fail, the Office of General Counsel would seek a finding of probable cause on these issues and at the same time seek probable cause to file suit on the original non-filer issue, with respect to which conciliation may already be deemed to have failed.

As the attached conciliation agreement reflects we are seeking a civil penalty of \$3,500. This amount seems to be warranted for several reasons.

The Committee failed to maintain records for receipts totaling \$15,135 (40.03% of total receipts), including two cash deposits, each greater than \$5000. In addition, receipts totaling \$18,088.28 were not reported to the FEC. To date, the Committee has not identified the source of these receipts which were included in 1976 amended reports filed February 1, 1978.

The Committee accepted corporate contributions totaling \$310.00. We have received no indication that the contributions have been refunded.

The Committee filed 1977 Quarterly Reports on February 1, 1978, only after the Commission's audit of the Committee in November 1977.

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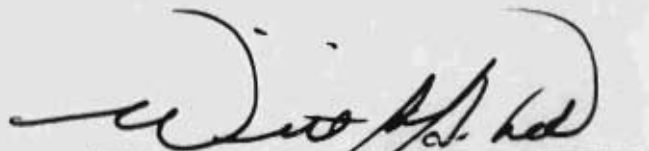
Since that time the Committee has failed to file reports for Year-End 1977, April 10, 1978, and July 10, 1978.

Recommendation

1. Find reasonable cause to believe that the Committee failed to adequately report and keep records as set forth in 2 U.S.C. §432 (c) (1) and (2), and §434(b) (2)-(8);
2. Find reasonable cause to believe that the Committee accepted illegal corporate contributions prohibited by 2 U.S.C. §441b(a);
3. Find reasonable cause to believe that the Committee failed to disclose the Committee depository as required by 2 U.S.C. §433(b) (9);
4. Find reasonable cause to believe that the Committee failed to include the required notification for solicitation literature as set forth in 2 U.S.C. §435(b); and
5. Find reasonable cause to believe that the Committee failed to file the 1977 Year End Report and April 10, 1978, Quarterly Report as set forth in 2 U.S.C. §434(a) (1).
6. Send attached letter and conciliation agreement.

Date

8/17/78



William C. Oldaker
General Counsel

80040224175



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jose E. Alegria
Comite Amigos de Jaime Benitez
75 Condada Avenue
Santurce, Puerto Rico 00907

RE: MUR 505

Dear Mr. Alegria:

On August , 1978, the Commission determined there was reasonable cause to believe that your committee violated the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the Comite Amigos de Jaime Benitez is in violation of:

- (A) 2 U.S.C. §432(c) (1) and (2) and 2 U.S.C. §434(b) (2) - (8) for failing to adequately report and keep records of receipts;
- (B) 2 U.S.C. §441b(a) for accepting illegal corporate contributions;
- (C) 2 U.S.C. §433(b) (9) for failing to properly disclose the Committee depository;
- (D) 2 U.S.C. §435(b) for failing to include the required notification on the Committee's solicitation literature;
- (E) 2 U.S.C. §434(a) (1) for failing to file the 1977 Year End Report, April 10 and July 10, 1978, Quarterly Reports.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. §437g(a) (5) (A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5000.

00040224176

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Fran Hagan, staff member assigned to this matter, at 202-523-4006 within ten days.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

80740221177

Audit Findings and Recommendations

A. Recordkeeping for Receipts

Section 432(c)(1) and (2) of Title 2, United States Code, states that the treasurer of a political committee shall keep a detailed and exact account of all contributions made to or for such committee, to include the identification of every person making a contribution in excess of \$50 with the date and amount thereof, and, if a person's contributions aggregate in excess of \$100 during a calendar year, the account shall include occupation and the principal place of business (if any).

Section 104.12(b) of Title 11, Code of Federal Regulations requires, in part, that each political committee required to file reports under the Act shall: 1) maintain records with respect to the matters reported, including vouchers, worksheets, receipts, bills and accounts which shall provide in sufficient detail the necessary information and data from which the filed reports may be verified; and 2) keep those records available for audit or inspection by the Commission or its authorized representatives for a period of not less than three (3) years.

During our audit we examined the Committee's receipt records, covering the period June 8, 1976 to October 30, 1976, which consisted of listings of the contributors' names and the amounts and dates of the contributions. Receipt records could not be located for the period November 1 - December 31, 1976. A comparison was made between available receipt records and total reportable receipts shown in the bank records from inception through September 30, 1977. Receipts per the Committee's bank records totalled \$37,812.99; however, available contributor records totalled only \$22,677.99, thus leaving a total of \$15,135 of receipts which were undocumented (40.03% of total receipts).

In addition, our review of the Committee's bank records revealed two (2) large cash deposits during the week just prior to the general election, as follows:

<u>DATE PER</u> <u>DEPOSIT TICKET</u>	<u>CASH</u>	<u>CHECKS</u>	<u>TOTAL</u> <u>DEPOSIT</u>
10/27/76	\$6,380.00	-0-	\$6,380.00
11/3/76*	\$5,110.00	\$1,550.00	\$6,660.00

* Was reflected on the bank statement at October 29, 1976.

8004024178

The Committee also failed to retain deposit receipts for four (4) deposits (July 28, September 17, October 6 and November 26, 1976), totalling \$17,440.00.

It is the opinion of the Audit staff that these two (2) large deposits, when added to the bank deposit of \$1,805 on November 26, 1976 (the only bank credit for the period November 1 - December 31, 1976), for a total of \$14,845, represent the bulk of the \$15,135 of receipts for which the Committee apparently maintained no records.

When questioned, the Treasurer was not able to identify the source of the large cash deposits or to explain the large over discrepancy in receipt records. The Treasurer was also unsure whether or not the contributors of these funds were included in the contributor lists reviewed by the Audit staff for the period ending October 30, 1976.

Recommendation

We recommended that the Committee and/or the Candidate make a reasonable effort to identify the sources of the unsupported contributions and furnish either copies of documentation obtained (including the four (4) unavailable deposit receipts) or evidence of their efforts to obtain the documentation to the Audit staff for review within 30 days of the Committee's receipt of this letter.

B. Reporting of Receipts

Section 434(b)(2) through (8) of Title 2, United States Code, requires reports filed under the Act to contain certain information with respect to receipts, including the total sum of individual contributions not otherwise itemized, the itemization of certain other types of receipts, and the total sum of all receipts made by or for the committee during the reporting period.

During the course of our audit, an examination of the Committee's bank records revealed a total of \$18,088.28 ^{1/} in receipts which the Committee did not report. This represents 47.84% of the Committee's total reportable receipts. Because of the recordkeeping problem discussed in Finding A, \$15,135.00 of these unreported receipts remain unidentified as to their source. It is the opinion of the Audit staff that, based on our review of the available records, the balance of the unreported receipts (\$2,953.28) ^{1/} is comprised of contributions from individuals.

^{1/} Of this amount, \$500 that was itemized by the Committee on Schedule A was not included in its receipt totals.

80040221179

Our audit also revealed that the Committee reported, and included in its receipt totals, general election expenditures made on its behalf by the State Popular Democratic Party totalling \$9,953:67 which were not required to be reported by the Committee.

We recommended that the Committee file a comprehensive amendment for 1976 reflecting an adjustment in Committee receipts for the period of \$8,134.61. On February 1, 1978, we received the Committee's 1976 comprehensive amendment which reflected the correct summary page total for receipts.

Recommendation

We recommended further that the Committee file a supplementary amendment, itemizing where necessary the undocumented receipts discussed in Finding A for which records are obtained.

C. Apparent Corporate Contributions

Section 441b(a) of Title 2, United States Code, states in part, that it is unlawful for any corporation to make a contribution to a political committee in connection with any Federal election, or for any candidate, political committee, or other person to knowingly accept any such contribution.

During the course of our audit, we determined that the Committee had received four (4) apparent corporate contributions totalling \$310 (see attached list). The corporate status of these business entities was confirmed with the Secretary of State's Office, San Juan, Puerto Rico, during the audit. The Treasurer stated he was unaware that the Committee had accepted any corporate contributions and felt that these had been accepted due to clerical oversight.

Recommendation

We recommended that the Committee refund these contributions to the parties involved and furnish documentary evidence of the refunds to the Audit staff within 30 days of receipt of this letter.

D. Reporting of Committee Activity Under Candidate's Name

Sections 434(a)(1) and (b) of Title 2, United States Code, require political committees supporting candidate(s), and each candidate for election to Federal office, to file with the Commission reports containing information on their receipts, expenditures, and beginning and ending cash.

8004022190

During the course of our audit it was determined that the Committee's receipt and expenditure activity, except for \$50 in receipts, had been reported to the Commission on reports reflecting only the Candidate's name. In discussions with the Treasurer it was determined that the Candidate raised and spent no funds himself, and that all campaign-related activity occurred through the Committee. Information on Committee receipt and expenditure activity was sent to the Resident Commissioner's office in Washington where the FEC reports were prepared and filed under the Candidate's name.

We recommended that the Committee and the Candidate submit comprehensive amendments for 1976 transferring all campaign activity from Candidate reports to reports properly reflecting the activity under the name of the Committee. On February 1, 1978, we received comprehensive amendments from the Candidate and the Committee correctly reflecting the transfer of receipt and expenditure activity totals from the Candidate to the Committee.

Recommendation

Because the Committee has satisfactorily complied with our recommendation, no further action on this finding will be recommended.



Reporting of Debts and Obligations

Section 434(b)(12) of Title 2, United States Code, states that reports filed by political committees shall disclose the amount and nature of debts and obligations owed by the committee, and requires that these debts and obligations be continuously reported until extinguished, together with a statement of circumstances under which they were extinguished.

Section 104.8(b) of Title 11, Code of Federal Regulations requires in part, that a debt, obligation, or other promise to pay in excess of \$500 be reported as of the time of the transaction.

Our examination of Committee records revealed an undisclosed obligation to the Committee's media firm which attained reportable status as of July 31, 1976, and which required continuous reporting through the year-end 1976 report at which time the balance owed was \$7,943.83. Since that time, the Committee has made no additional payments on this obligation. At no time during this period did the Committee or the Candidate disclose this obligation in its reports to the Commission. The Treasurer indicated this omission was due to a misunderstanding of the reporting requirements for debts and obligations.

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On February 1, 1978, the Committee filed a report (as of September 30, 1977) disclosing the obligation on Schedule C as required.

Recommendation

We recommended that the Committee, within 30 days of receipt of this letter, file a comprehensive amendment for 1976 to include the appropriate Schedule C, disclosing the total obligation, payments to date, and balance outstanding on the above-mentioned obligation. Furthermore, the Committee was advised that it must continue to file reports until the debt is extinguished (in accordance with Section 434(b)(12) of Title 2 of the United States Code), and that any settlement of the obligation with the corporate vendor at less than the value of the services is subject to Commission review, (per Section 114.10(c)(3) of Title 11, Code of Federal Regulations).

F. Itemization of Contributions

Section 434(b)(2) of Title 2, United States Code, requires a committee to include in its reports the full name and address, occupation and principal place of business of each person making a contribution(s) in excess of or aggregating in excess of \$100 within a calendar year, together with the amount and date of such contribution(s).

Our review of the Committee's available receipt records revealed nine (9) contributions from as many contributors in excess of \$100 or aggregating in excess of \$100 which were not itemized by the Committee as required in its reports. These contributions ranged in amount from \$50 to \$500 and totalled \$1,400. The Treasurer attributed these omissions to clerical oversight in the preparation of the reports.

In addition, of the 31 contributions itemized on the Candidate's reports:

- a) 3 contributions (9.67%) failed to reflect an address
- b) 11 contributions (35.48%) failed to reflect the individual's occupation,
- c) 19 contributions (61.29%) failed to reflect the individual's principal place of business.

We recommended that the Committee file a comprehensive amendment for 1976 itemizing the previously omitted contributions, and reflecting the omitted address, occupation, and principal place of business information for those itemized contributions noted above. On February 1, 1978, we received the Committee's comprehensive amendment which materially complied with our recommendation.

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Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

G. Reporting and Itemization of Expenditures

Section 434(b)(9) and (11) of Title 2, United States Code requires that a committee disclose in its reports the identification of each person to whom expenditures have been made by such committee within the calendar year in an aggregate amount in excess of \$100, the amount, date and purpose of each such expenditure; and, the total sum of expenditures made by such committee during the calendar year.

During the course of the audit, our examination of the Committee's expenditures revealed 12 expenditures in excess of \$100 which the Committee neither itemized as required, nor included in its total reported expenditures. These 12 expenditures (26.36% of the total number of itemizable expenditures) ranged in amount from \$411 to \$3,000 and totalled \$13,146 (35.13% of total itemizable expenditures). The Treasurer attributed these omissions to a lack of co-ordination between the campaign office in San Juan and the Resident Commissioner's office in Washington where the FEC reports were prepared.

We recommended that the Committee file a 1976 comprehensive amendment itemizing these previously omitted expenditures and adjusting its year-to-date totals accordingly. On February 1, 1978, the Committee filed its comprehensive amendment for 1976 including the expenditures noted above.

Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

(H) Disclosure of Committee Depository

Section 433(b)(9) of Title 2, United States Code, requires that a committee reveal in its statement of organization a listing of all banks, safety deposit boxes, or other repositories used by the committee.

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Our review of the Committee's bank records revealed the use of a depository which was not reported as required by the Committee on its Statement of Organization, in any amendments submitted thereto, nor on the Statement of Candidate. Furthermore, the depository disclosed by the Candidate on his Statement of Candidacy and the Committee in its Statement of Organization was never used by the Committee during the period under audit.

Recommendation

We recommended that the Committee file an amended Statement of Organization disclosing the depository used within 30 days of receipt of this letter. We also recommended that the Candidate file an amended Statement of Candidacy designating the account as the Committee depository.

I. Disclosure of Fundraising Activity

Section 434(b)(6)(A) and (B) of Title 2, United States Code, requires that reports filed by committees under the Act shall disclose the total amount of proceeds from the sale of tickets to each dinner, rally, and other fundraising event, and mass collections made at such events.

During the course of our audit, it was determined that a major fundraising banquet was held by the Committee in September 1976, at the Caribe Hilton, San Juan, which was not disclosed by the Committee as required on Schedule D. The Treasurer stated that a deposit of \$12,410 made to the Committee's account on September 17, 1976, represented the bulk of proceeds collected from the dinner.

We recommended that the Committee file its 1976 comprehensive amendment to include the appropriate Schedule D disclosing the total of proceeds from the fundraising activity referred to above. On February 1, 1978, the Committee filed its 1976 comprehensive amendment disclosing the fundraiser as recommended.

J. Filing of Reports in Non-Election Year

Sections 104.1(a), (c)(2) and (c)(3)(i) of Title 11, Code of Federal Regulations, require each political committee to file quarterly reports of contributions and expenditures until all debts and obligations relating to that committee's Federal election activity are extinguished and the committee has filed a valid Notice of Termination. In any non-election year such committee shall only be required to file quarterly reports for a calendar quarter during which contributions received or expenditures made, when added together, exceed \$5,000.

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If the level of activity does not exceed \$5,000 per calendar quarter, the political committee shall notify the Commission on FEC Form 3a, or by letter containing the same information, at the close of the first quarter in which the exemption applies.

Our review of the Committee's reports filed with the Commission revealed no FEC Form 3a or letter equivalent filed by the Committee for the first quarter 1977. Bank records for the period indicated \$9.00 of expenditure activity and no receipt activity.

Recommendation

We recommended that the Committee file the omitted FEC Form 3a for the first quarter of 1977 within 30 days of receipt of this letter.

(K)

Other Matters

Noted below is a matter for which the Audit staff feels no further action is required by the Committee:

Our examination of the Committee's solicitation literature consisting of a mass mailing letter and a newspaper ad solicitation revealed that neither contained the notification required by Section 435(b) of Title 2 of the United States Code. The Committee was advised of the required notification for all solicitation literature in accordance with this section of the Act.

80040224135

COMITE AMIGOS DE JAIME BENITEZ
SCHEDULE OF APPARENT CORPORATE CONTRIBUTIONS

<u>CONTRIBUTOR</u>	<u>DATE</u>	<u>AMOUNT</u>	<u>DATE OF INCORPORATION</u>
1) Lube Construction Corp. Hato Rey, P.R.	6/76	\$ 40.00	1/16/69
2) Esteban Huertas, Inc. Box 792 Caguas, P.R.	6/76	20.00	3/2/73
3) Robert F. McCloskey Associates, Inc.	9/20/76	200.00	8/9/73
4) Underwear Corp. GPO Box 2947 San Juan, P.R. 00936 (listed under "Grana Corp." in Secretary of State's records)	8/26/76	50.00	11/17/6
	TOTAL	(\$310.00	

8004034136



FEDERAL ELECTION COMMISSION

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

July 18, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: MJR 505 - Interim Report dated 7-14-78
Received in Office of Commission
Secretary: 7-17-78, 12:30

The above-mentioned document was circulated on a 24
hour no-objection basis at 3:30 p.m., July 17, 1978.

As of 4:00 p.m. this date, no objections have been
received in the Office of Commission Secretary to the
Interim Report.

Commissioners Aikens, Springer, Staebler, and Thomson returned
their papers by the deadline.

80010221197

July 17, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 505

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

Thank you.

90010224188

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Comite Amigos de) MUR 505(78)
Jaime Benitez)

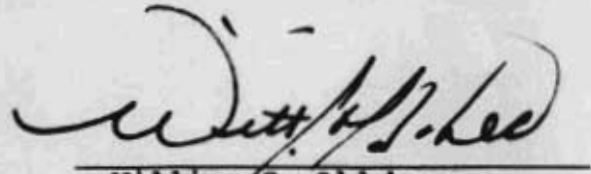
INTERIM REPORT

80040224199
On June 1, 1978, the Commission found reason to believe that the Comite Amigos de Jaime Benitez (the Committee) violated the Federal Election Campaign Act of 1971, as amended (the Act) as follows: (A) failed to adequately report and keep records of receipts as set forth in - (8); (B) accepted illegal corporate contributions as set forth in 2 U.S.C. §441b(a); (C) failed to properly disclose the Committee depository as set forth in 2 U.S.C. §433(b)(9); (D) failed to include the required notification for all solicitation literature as set forth in 2 U.S.C. §435(b); and (E) failed to file the 1977 Year-End Report and April 10, 1978 Quarterly Report as set forth in 2 U.S.C. §434(a)(1). (See General Counsel's Report dated May 23, 1978).

The Committee received a notification letter on June 16, 1978 and was due to respond by July 7, 1978. As of this date, we have not receive a response from Jose Alegria, the treasurer of the Committee.

Therefore, this Office is preparing to investigate the Committee and to determine whether it should recommend reasonable cause to believe with regard to the violation set out in the General Counsel's Report dated May 23, 1978.

7/14/78
Date



William C. Oldaker
General Counsel

80040224190



FEDERAL ELECTION COMMISSION

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

June 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jose E. Alegria
Comite Amigos De Jaime Benitez
75 Condado Avenue
Santurce, Puerto Rico 00907

Re: MUR 505(78)

Dear Mr. Alegria:

On April 18, 1978, you received a letter and conciliation agreement with regard to the Comite Amigos De Jaime Benitez (the Committee) failure to file timely 1977 Quarterly Reports as required by 2 U.S.C. §434(a)(1).

On April 25, 1978, the Committee was referred from the Audit Division to the Office of General Counsel for further investigation due to your failure to comply with the Audit Division's requests set forth in a letter and attached report dated March 10, 1978. As a result, on June 1, 1978, the Commission found reason to believe that the Committee is in violation of: (A) 2 U.S.C. §432(c)(1) and (2) and 2 U.S.C. §434(b)(2)-(8) for failing to adequately report and keep records of receipts; (B) 2 U.S.C. §441b(a) for accepting illegal corporate contributions; (C) 2 U.S.C. §433(b)(9) for failing to properly disclose the Committee depository; (D) 2 U.S.C. §435(b) for failing to include the required notification on the Committee's solicitation literature; and (E) 2 U.S.C. §434(a)(1) for failing to file the 1977 Year End Report and April 10, 1978 Quarterly Report.

Under the Federal Election Campaign Act of 1971 (the Act), as amended, you have an opportunity to demonstrate that no action should be taken against you. 2 U.S.C. §437g. Please submit any factual or legal materials which you consider relevant to the

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Commission's deliberations within 15 days of receipt of this letter. A copy of the Act has been enclosed.

This notification letter shall remain confidential in accordance with 2 U.S.C. §437g(a) (3) unless you state to the Commission in writing that you wish the investigation to be made public. If you have any questions, please contact Ellen Hughes (telephone no. (202) 523-4026 or Toll Free number 800-424-9530), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

1000 300

THE FOLLOWING SERVICE IS REQUESTED (Check one):
 REGULAR MAIL AND DATE DELIVERED
 REGISTERED MAIL AND ADDRESS OF DELIVERY
 REGISTERED MAIL ONLY
 REGISTERED MAIL ONLY AND ADDRESS OF DELIVERY
 REGISTERED MAIL ONLY AND ADDRESS OF DELIVERY AND POSTMASTER'S RECEIPT FOR FEES

1. ADDRESSEE'S NAME
 2. ADDRESSEE'S ADDRESS
 3. ADDRESSEE'S CITY, STATE AND ZIP CODE

POSTAGE PAID BY ADDRESSEE OR BY ADDRESSEE'S ORDER

I have received the article described above.
 SIGNATURE Addressee Authorized Agent
 (Ellen Hughes)

DATE OF DELIVERY: _____ POSTMAN: _____

STATION: _____

UNABLE TO DELIVER REASON: _____

JUN 18 1972

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Comite Amigos De)
Jaime Benitez)

MUR 505 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 1, 1978, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

- 1) Find reason to believe that the Comite Amigos De Jaime Benitez failed to adequately report and keep records of receipts as set forth in 2 U.S.C. Sections 432(c)(1) and (2), and 434(b)(2) - (8).
- 2) Find reason to believe that the Comite Amigos De Jaime Benitez accepted illegal corporate contributions as set forth in 2 U.S.C. Section 441b(a).
- 3) Find reason to believe that the Comite Amigos De Jaime Benitez failed to properly disclose the Committee depository as set forth in 2 U.S.C. Section 433(b)(9).
- 4) Find reason to believe that the Comite Amigos De Jaime Benitez failed to include the required notification for all solicitation literature as set forth in 2 U.S.C. Section 435(b).
- 5) Find reason to believe that the Comite Amigos De Jaime Benitez failed to file the 1977 Year-End Report and the April 10, 1978 Quarterly Report as set forth in 2 U.S.C. Section 434(a)(1).
- 6) Send the letter attached to the General Counsel's Report signed May 26, 1978.

Date

6/2/78

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

80040224193

BEFORE THE FEDERAL ELECTION COMMISSION
May 23, 1978

In the Matter of)
)
Comite Amigos De) MUR 505 (78)
Jaime Benitez)

General Counsel's Report

I. Background

The Comite Amigos De Jaime Benitez (the Committee) was referred to the General Counsel's Office from the Reports Analysis Division on January 16, 1978 for failure to file the 1977 Quarterly Reports as required 2 U.S.C. §434 (a)(1). On February 1, 1978, the Committee filed the required reports. On April 12, 1978, the Commission approved the General Counsel's recommendation to send a letter and attached conciliation agreement to the Committee for failure to file the 1977 required reports.

II. Further Developments

On March 10, 1978, the Audit Division sent a letter to the Committee requesting further information as a result of an audit conducted in October, 1977. On April 15, 1978, the Audit Division referred its audit report to the Office of General Counsel for further compliance procedures. To date, the Committee has not responded to either the Audit Division's letter dated March 10, 1978, or to the General Counsel's letter dated April 13, 1978. Additionally, the Committee has failed to file the 1977 Year-End Report and the April 10, 1978 Quarterly Report.

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III. Legal Analysis

The audit report (Attachment A) contains a number of apparent violations. This Office believes that these violations warrant further investigation by the Commission. A list of allegations are as follows:

(1) Recordkeeping for Receipts - 2 U.S.C. §432(c)(1) and (2); (2) Reporting of Receipts - 2 U.S.C. §434(b)(2) - 8; (3) Corporate Contributions - 2 U.S.C. §441b(a); Disclosure of Committee Depository - 2 U.S.C. §433(b)(9); and (5) Required Notification for Solicitation Literature - 2 U.S.C. §435(b).

The basis for these findings are contained in the audit report at Attachment A. The itemization of the corporate contributions are contained in Attachment I to the audit report. Further compliance procedures with regard to the Committee's non-filing status as well as apparent violations revealed by the Audit Division are consolidated in this matter under review.

IV. Recommendation

It is recommended that the Commission find reason to believe that the Committee: (A) failed to adequately report and keep records of receipts as set forth in 2 U.S.C. §432(c)(1) and (2), and 2 U.S.C. §434(b)(2) - (8); (B) accepted illegal corporate contributions as set forth in 2 U.S.C. §441b(a); (C) failed to properly disclose the Committee depository as set forth in 2 U.S.C. §433(b)(9); (D) failed to include the required

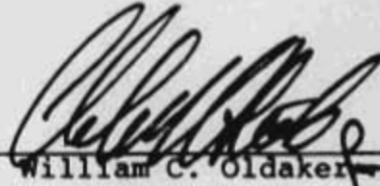
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notification for all solicitation literature as set forth in 2 U.S.C. §435(b); and (E) failed to file the 1977 Year-End Report and April 10, 1978 Quarterly Report as set forth in 2 U.S.C. §434(a)(1). Send attached notification letter.

FEDERAL ELECTION COMMISSION

Date:

26 May 1978



William C. Oldaker *WCO*
General Counsel

80040224196

*Judy B,
Ellen Hughes
has a non-
filed MUR on
this committee*

April 25, 1978



FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM

TO: BILL OLDAKER
THROUGH: ORLANDO B. POTTER *OBP*
STAFF DIRECTOR
FROM: *RCR* BOB COSTA/*CLR* CRAIG RUSSELL
SUBJECT: COMITE' AMIGOS DE JAIME BENITEZ -
FAILURE TO RESPOND TO AUDIT NOTIFICATION
LETTER

Attached please find an updated listing of the findings resulting from the audit of the Comite' Amigos de Jaime Benitez.

The Committee has to date failed to respond to certain recommendations embodied in our audit notification letter of March 10, 1978. Please note that Finding C pertains to the acceptance of four (4) apparent corporate contributions. Because of the apparent seriousness of certain findings contained herein, and in accordance with your recommendation to the Audit Division of March 2, 1978, we are resubmitting the findings for your review and consideration as a compliance matter.

If you have any questions concerning any of the attached findings, please contact Craig Russell at extension 3-4155.

Attachment as stated

90040224197



Audit Findings and Recommendations

A. Recordkeeping for Receipts

Section 432(c)(1) and (2) of Title 2, United States Code, states that the treasurer of a political committee shall keep a detailed and exact account of all contributions made to or for such committee, to include the identification of every person making a contribution in excess of \$50 with the date and amount thereof, and, if a person's contributions aggregate in excess of \$100 during a calendar year, the account shall include occupation and the principal place of business (if any).

Section 104.12(b) of Title 11, Code of Federal Regulations requires, in part, that each political committee required to file reports under the Act shall: 1) maintain records with respect to the matters reported, including vouchers, worksheets, receipts, bills and accounts which shall provide in sufficient detail the necessary information and data from which the filed reports may be verified; and 2) keep those records available for audit or inspection by the Commission or its authorized representatives for a period of not less than three (3) years.

During our audit we examined the Committee's receipt records, covering the period June 8, 1976 to October 30, 1976, which consisted of listings of the contributors' names and the amounts and dates of the contributions. Receipt records could not be located for the period November 1 - December 31, 1976. A comparison was made between available receipt records and total reportable receipts shown in the bank records from inception through September 30, 1977. Receipts per the Committee's bank records totalled \$37,812.99; however, available contributor records totalled only \$22,677.99, thus leaving a total of \$15,135 of receipts which were undocumented (40.03% of total receipts).

In addition, our review of the Committee's bank records revealed two (2) large cash deposits during the week just prior to the general election, as follows:

<u>DATE PER DEPOSIT TICKET</u>	<u>CASH</u>	<u>CHECKS</u>	<u>TOTAL DEPOSIT</u>
10/27/76	\$6,380.00	-0-	\$6,380.00
11/3/76*	\$5,110.00	\$1,550.00	\$6,660.00

* Was reflected on the bank statement at October 29, 1976.

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The Committee also failed to retain deposit receipts for four (4) deposits (July 28, September 17, October 6 and November 26, 1976), totalling \$17,440.00.

It is the opinion of the Audit staff that these two (2) large deposits, when added to the bank deposit of \$1,805 on November 26, 1976 (the only bank credit for the period November 1 - December 31, 1976), for a total of \$14,845, represent the bulk of the \$15,135 of receipts for which the Committee apparently maintained no records.

When questioned, the Treasurer was not able to identify the source of the large cash deposits or to explain the large overall discrepancy in receipt records. The Treasurer was also unsure whether or not the contributors of these funds were included in the contributor lists reviewed by the Audit staff for the period ending October 30, 1976.

Recommendation

We recommended that the Committee and/or the Candidate make a reasonable effort to identify the sources of the unsupported contributions and furnish either copies of documentation obtained (including the four (4) unavailable deposit receipts) or evidence of their efforts to obtain the documentation to the Audit staff for review within 30 days of the Committee's receipt of this letter.

B. Reporting of Receipts

Section 434(b) (2) through (8) of Title 2, United States Code, requires reports filed under the Act to contain certain information with respect to receipts, including the total sum of individual contributions not otherwise itemized, the itemization of certain other types of receipts, and the total sum of all receipts made by or for the committee during the reporting period.

During the course of our audit, an examination of the Committee's bank records revealed a total of \$18,088.28 ^{1/} in receipts which the Committee did not report. This represents 47.84% of the Committee's total reportable receipts. Because of the recordkeeping problem discussed in Finding A, \$15,135.00 of these unreported receipts remain unidentified as to their source. It is the opinion of the Audit staff that, based on our review of the available records, the balance of the unreported receipts (\$2,953.28) ^{1/} is comprised of contributions from individuals.

^{1/} Of this amount, \$500 that was itemized by the Committee on Schedule A was not included in its receipt totals.

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Our audit also revealed that the Committee reported, and included in its receipt totals, general election expenditures made on its behalf by the State Popular Democratic Party totalling \$9,953.67 which were not required to be reported by the Committee.

We recommended that the Committee file a comprehensive amendment for 1976 reflecting an adjustment in Committee receipts for the period of \$8,134.61. On February 1, 1978, we received the Committee's 1976 comprehensive amendment which reflected the correct summary page total for receipts.

Recommendation

We recommended further that the Committee file a supplementary amendment, itemizing where necessary the undocumented receipts discussed in Finding A for which records are obtained.

C. Apparent Corporate Contributions

Section 441b(a) of Title 2, United States Code, states in part, that it is unlawful for any corporation to make a contribution to a political committee in connection with any Federal election, or for any candidate, political committee, or other person to knowingly accept any such contribution.

During the course of our audit, we determined that the Committee had received four (4) apparent corporate contributions totalling \$310 (see attached list). The corporate status of these business entities was confirmed with the Secretary of State's Office, San Juan, Puerto Rico, during the audit. The Treasurer stated he was unaware that the Committee had accepted any corporate contributions and felt that these had been accepted due to clerical oversight.

Recommendation

We recommended that the Committee refund these contributions to the parties involved and furnish documentary evidence of the refunds to the Audit staff within 30 days of receipt of this letter.

D. Reporting of Committee Activity Under Candidate's Name

Sections 434(a)(1) and (b) of Title 2, United States Code, require political committees supporting candidate(s), and each candidate for election to Federal office, to file with the Commission reports containing information on their receipts, expenditures, and beginning and ending cash.

80040224200

During the course of our audit it was determined that the Committee's receipt and expenditure activity, except for \$50 in receipts, had been reported to the Commission on reports reflecting only the Candidate's name. In discussions with the Treasurer it was determined that the Candidate raised and spent no funds himself, and that all campaign-related activity occurred through the Committee. Information on Committee receipt and expenditure activity was sent to the Resident Commissioner's office in Washington where the FEC reports were prepared and filed under the Candidate's name.

We recommended that the Committee and the Candidate submit comprehensive amendments for 1976 transferring all campaign activity from Candidate reports to reports properly reflecting the activity under the name of the Committee. On February 1, 1978, we received comprehensive amendments from the Candidate and the Committee correctly reflecting the transfer of receipt and expenditure activity totals from the Candidate to the Committee.

Recommendation

Because the Committee has satisfactorily complied with our recommendation, no further action on this finding will be recommended.

Reporting of Debts and Obligations

Section 434(b)(12) of Title 2, United States Code, states that reports filed by political committees shall disclose the amount and nature of debts and obligations owed by the committee, and requires that these debts and obligations be continuously reported until extinguished, together with a statement of circumstances under which they were extinguished.

Section 104.8(b) of Title 11, Code of Federal Regulations, requires in part, that a debt, obligation, or other promise to pay in excess of \$500 be reported as of the time of the transaction.

Our examination of Committee records revealed an undisclosed obligation to the Committee's media firm which attained reportable status as of July 31, 1976, and which required continuous reporting through the year-end 1976 report at which time the balance owed was \$7,943.83. Since that time, the Committee has made no additional payments on this obligation. At no time during this period did the Committee or the Candidate disclose this obligation in its reports to the Commission. The Treasurer indicated this omission was due to a misunderstanding of the reporting requirements for debts and obligations.

80010224201

On February 1, 1978, the Committee filed a report (as of September 30, 1977) disclosing the obligation on Schedule C as required.

Recommendation

We recommended that the Committee, within 30 days of receipt of this letter, file a comprehensive amendment for 1976 to include the appropriate Schedule C, disclosing the total obligation, payments to date, and balance outstanding on the above-mentioned obligation. Furthermore, the Committee was advised that it must continue to file reports until the debt is extinguished (in accordance with Section 434(b)(12) of Title 2 of the United States Code), and that any settlement of the obligation with the corporate vendor at less than the value of the services is subject to Commission review, (per Section 114.10(c)(3) of Title 11, Code of Federal Regulations).

F. Itemization of Contributions

Section 434(b)(2) of Title 2, United States Code, requires a committee to include in its reports the full name and address, occupation and principal place of business of each person making a contribution(s) in excess of or aggregating in excess of \$100 within a calendar year, together with the amount and date of such contribution(s).

Our review of the Committee's available receipt records revealed nine (9) contributions from as many contributors in excess of \$100 or aggregating in excess of \$100 which were not itemized by the Committee as required in its reports. These contributions ranged in amount from \$50 to \$500 and totalled \$1,400. The Treasurer attributed these omissions to clerical oversight in the preparation of the reports.

In addition, of the 31 contributions itemized on the Candidate's reports:

- a) 3 contributions (9.67%) failed to reflect an address,
- b) 11 contributions (35.48%) failed to reflect the individual's occupation,
- c) 19 contributions (61.29%) failed to reflect the individual's principal place of business.

We recommended that the Committee file a comprehensive amendment for 1976 itemizing the previously omitted contributions, and reflecting the omitted address, occupation, and principal place of business information for those itemized contributions noted above. On February 1, 1978, we received the Committee's comprehensive amendment which materially complied with our recommendation.

8004034202

Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

G. Reporting and Itemization of Expenditures

Section 434(b)(9) and (11) of Title 2, United States Code, requires that a committee disclose in its reports the identification of each person to whom expenditures have been made by such committee within the calendar year in an aggregate amount in excess of \$100, the amount, date and purpose of each such expenditure; and, the total sum of expenditures made by such committee during the calendar year.

During the course of the audit, our examination of the Committee's expenditures revealed 12 expenditures in excess of \$100 which the Committee neither itemized as required, nor included in its total reported expenditures. These 12 expenditures (36.36% of the total number of itemizable expenditures) ranged in amount from \$411 to \$3,000 and totalled \$13,146 (35.13% of total itemizable expenditures). The Treasurer attributed these omissions to a lack of co-ordination between the campaign office in San Juan and the Resident Commissioner's office in Washington where the FEC reports were prepared.

We recommended that the Committee file a 1976 comprehensive amendment itemizing these previously omitted expenditures and adjusting its year-to-date totals accordingly. On February 1, 1978, the Committee filed its comprehensive amendment for 1976 including the expenditures noted above.

Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

(H) Disclosure of Committee Depository

Section 433(b)(9) of Title 2, United States Code, requires that a committee reveal in its statement of organization a listing of all banks, safety deposit boxes, or other repositories used by the committee.

80040224203

Our review of the Committee's bank records revealed the use of a depository which was not reported as required by the Committee on its Statement of Organization, in any amendments submitted thereto, nor on the Statement of Candidate. Furthermore, the depository disclosed by the Candidate on his Statement of Candidacy and the Committee in its Statement of Organization was never used by the Committee during the period under audit.

Recommendation

We recommended that the Committee file an amended Statement of Organization disclosing the depository used within 30 days of receipt of this letter. We also recommended that the Candidate file an amended Statement of Candidacy designating the account as the Committee depository.

I. Disclosure of Fundraising Activity

Section 434(b)(6)(A) and (B) of Title 2, United States Code, requires that reports filed by committees under the Act shall disclose the total amount of proceeds from the sale of tickets to each dinner, rally, and other fundraising event, and mass collections made at such events.

During the course of our audit, it was determined that a major fundraising banquet was held by the Committee in September 1976, at the Caribe Hilton, San Juan, which was not disclosed by the Committee as required on Schedule D. The Treasurer stated that a deposit of \$12,410 made to the Committee's account on September 17, 1976, represented the bulk of proceeds collected from the dinner.

We recommended that the Committee file its 1976 comprehensive amendment to include the appropriate Schedule D disclosing the total of proceeds from the fundraising activity referred to above. On February 1, 1978, the Committee filed its 1976 comprehensive amendment disclosing the fundraiser as recommended.

J. Filing of Reports in Non-Election Year

Sections 104.1(a), (c)(2) and (c)(3)(i) of Title 11, Code of Federal Regulations, require each political committee to file quarterly reports of contributions and expenditures until all debts and obligations relating to that committee's Federal election activity are extinguished and the committee has filed a valid Notice of Termination. In any non-election year such committee shall only be required to file quarterly reports for a calendar quarter during which contributions received or expenditures made, when added together, exceed \$5,000.

80040221204

If the level of activity does not exceed \$5,000 per calendar quarter, the political committee shall notify the Commission on FEC Form 3a, or by letter containing the same information, at the close of the first quarter in which the exemption applies.

Our review of the Committee's reports filed with the Commission revealed no FEC Form 3a or letter equivalent filed by the Committee for the first quarter 1977. Bank records for the period indicated \$9.00 of expenditure activity and no receipt activity.

Recommendation

We recommended that the Committee file the omitted FEC Form 3a for the first quarter of 1977 within 30 days of receipt of this letter.

K

Other Matters

Noted below is a matter for which the Audit staff feels no further action is required by the Committee:

Our examination of the Committee's solicitation literature consisting of a mass mailing letter and a newspaper ad solicitation, revealed that neither contained the notification required by Section 435(b) of Title 2 of the United States Code. The Committee was advised of the required notification for all solicitation literature in accordance with this section of the Act.

80040224205

ATTACHMENT I

COMITE AMIGOS DE JAIME BENITEZ
SCHEDULE OF APPARENT CORPORATE CONTRIBUTIONS

<u>CONTRIBUTOR</u>	<u>DATE</u>	<u>AMOUNT</u>	<u>DATE OF INCORPORATION</u>
1) Lube Construction Corp. Hato Rey, P.R.	6/76	\$ 40.00	1/16/69
2) Esteban Huertas, Inc. Box 792 Caguas, P.R.	6/76	20.00	3/2/73
3) Robert F. McCloskey Associates, Inc.	9/20/76	200.00	8/9/73
4) Underwear Corp. GPO Box 2947 San Juan, P.R. 00936 (listed under "Grana Corp." in Secretary of State's records)	8/26/76	50.00	11/17/64
	TOTAL	(\$310.00)	

80040224206



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jose E. Alegria
Comite Amigos De Jaime Benitez
75 Condado Avenue
Santurce, Puerto Rico 00907

Re: MUR 505(78)

Dear Mr. Alegria:

On April 18, 1978, you received a letter and conciliation agreement with regard to the Comite Amigos De Jaime Benitez (the Committee) failure to file timely 1977 Quarterly Reports as required by 2 U.S.C. §434(a)(1).

On April 25, 1978, the Committee was referred from the Audit Division to the Office of General Counsel for further investigation due to your failure to comply with the Audit Division's requests set forth in a letter and attached report dated March 10, 1978. As a result, on May , 1978, the Commission found reason to believe that the Committee is in violation of: (A) 2 U.S.C. §432(c)(1) and (2) and 2 U.S.C. §434 (b)(2)-(8) for failing to adequately report and keep records of receipts; (B) 2 U.S.C. §441b(a) for accepting illegal corporate contributions; (C) 2 U.S.C. §433(b)(9) for failing to properly disclose the Committee depository; (D) 2 U.S.C. §435(b) for failing to include the required notification on the Committee's solicitation literature; and (E) 2 U.S.C. §434(a)(1) for failing to file the 1977 Year End Report and April 10, 1978 Quarterly Report.

Under the Federal Election Campaign Act of 1971 (the Act), as amended, you have an opportunity to demonstrate that no action should be taken against you. 2 U.S.C. §437g. Please submit any factual or legal materials which you consider relevant to the

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Commission's deliberations within 15 days of receipt of this letter. A copy of the Act has been enclosed.

This notification letter shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. If you have any questions, please contact Ellen Hughes (telephone no. (202) 523-4026 or Toll Free number 800-424-9530), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

80040224208



FEDERAL ELECTION COMMISSION

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

*combine
w/ MUR 505*

April 25, 1978

MEMORANDUM

TO: BILL OLDAKER

THROUGH: ORLANDO B. POTTER *OBP*
STAFF DIRECTOR

FROM: *RCR* BOB COSTA/*RR* CRAIG RUSSELL

SUBJECT: COMITE' AMIGOS DE JAIME BENITEZ -
FAILURE TO RESPOND TO AUDIT NOTIFICATION
LETTER

Attached please find an updated listing of the findings resulting from the audit of the Comite' Amigos de Jaime Benitez.

The Committee has to date failed to respond to certain recommendations embodied in our audit notification letter of March 10, 1978. Please note that Finding C pertains to the acceptance of four (4) apparent corporate contributions. Because of the apparent seriousness of certain findings contained herein, and in accordance with your recommendation to the Audit Division of March 2, 1978, we are resubmitting the findings for your review and consideration as a compliance matter.

If you have any questions concerning any of the attached findings, please contact Craig Russell at extension 3-4155.

Attachment as stated



9001000409

Audit Findings and Recommendations

A. Recordkeeping for Receipts

Section 432(c)(1) and (2) of Title 2, United States Code, states that the treasurer of a political committee shall keep a detailed and exact account of all contributions made to or for such committee, to include the identification of every person making a contribution in excess of \$50 with the date and amount thereof, and, if a person's contributions aggregate in excess of \$100 during a calendar year, the account shall include occupation and the principal place of business (if any).

Section 104.12(b) of Title 11, Code of Federal Regulations, requires, in part, that each political committee required to file reports under the Act shall: 1) maintain records with respect to the matters reported, including vouchers, worksheets, receipts, bills and accounts which shall provide in sufficient detail the necessary information and data from which the filed reports may be verified; and 2) keep those records available for audit or inspection by the Commission or its authorized representatives for a period of not less than three (3) years.

During our audit we examined the Committee's receipt records, covering the period June 8, 1976 to October 30, 1976, which consisted of listings of the contributors' names and the amounts and dates of the contributions. Receipt records could not be located for the period November 1 - December 31, 1976. A comparison was made between available receipt records and total reportable receipts shown in the bank records from inception through September 30, 1977. Receipts per the Committee's bank records totalled \$37,812.99; however, available contributor records totalled only \$22,677.99, thus leaving a total of \$15,135 of receipts which were undocumented (40.03% of total receipts).

In addition, our review of the Committee's bank records revealed two (2) large cash deposits during the week just prior to the general election, as follows:

<u>DATE PER DEPOSIT TICKET</u>	<u>CASH</u>	<u>CHECKS</u>	<u>TOTAL DEPOSIT</u>
10/27/76	\$6,380.00	-0-	\$6,380.00
11/3/76*	\$5,110.00	\$1,550.00	\$6,660.00

* Was reflected on the bank statement at October 29, 1976.

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The Committee also failed to retain deposit receipts for four (4) deposits (July 28, September 17, October 6 and November 26, 1976), totalling \$17,440.00.

It is the opinion of the Audit staff that these two (2) large deposits, when added to the bank deposit of \$1,805 on November 26, 1976 (the only bank credit for the period November 1 - December 31, 1976), for a total of \$14,845, represent the bulk of the \$15,135 of receipts for which the Committee apparently maintained no records.

When questioned, the Treasurer was not able to identify the source of the large cash deposits or to explain the large overall discrepancy in receipt records. The Treasurer was also unsure whether or not the contributors of these funds were included in the contributor lists reviewed by the Audit staff for the period ending October 30, 1976.

Recommendation

We recommended that the Committee and/or the Candidate make a reasonable effort to identify the sources of the unsupported contributions and furnish either copies of documentation obtained (including the four (4) unavailable deposit receipts) or evidence of their efforts to obtain the documentation to the Audit staff for review within 30 days of the Committee's receipt of this letter.

B. Reporting of Receipts

Section 434(b)(2) through (8) of Title 2, United States Code, requires reports filed under the Act to contain certain information with respect to receipts, including the total sum of individual contributions not otherwise itemized, the itemization of certain other types of receipts, and the total sum of all receipts made by or for the committee during the reporting period.

During the course of our audit, an examination of the Committee's bank records revealed a total of \$18,088.28 ^{1/} in receipts which the Committee did not report. This represents 47.84% of the Committee's total reportable receipts. Because of the recordkeeping problem discussed in Finding A, \$15,135.00 of these unreported receipts remain unidentified as to their source. It is the opinion of the Audit staff that, based on our review of the available records, the balance of the unreported receipts (\$2,953.28) ^{1/} is comprised of contributions from individuals.

^{1/} Of this amount, \$500 that was itemized by the Committee on Schedule A was not included in its receipt totals.

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Our audit also revealed that the Committee reported, and included in its receipt totals, general election expenditures made on its behalf by the State Popular Democratic Party totalling \$9,953.67 which were not required to be reported by the Committee.

We recommended that the Committee file a comprehensive amendment for 1976 reflecting an adjustment in Committee receipts for the period of \$8,134.61. On February 1, 1978, we received the Committee's 1976 comprehensive amendment which reflected the correct summary page total for receipts.

Recommendation

We recommended further that the Committee file a supplementary amendment, itemizing where necessary the undocumented receipts discussed in Finding A for which records are obtained.

C. Apparent Corporate Contributions

Section 441b(a) of Title 2, United States Code, states in part, that it is unlawful for any corporation to make a contribution to a political committee in connection with any Federal election, or for any candidate, political committee, or other person to knowingly accept any such contribution.

During the course of our audit, we determined that the Committee had received four (4) apparent corporate contributions totalling \$310 (see attached list). The corporate status of these business entities was confirmed with the Secretary of State's Office, San Juan, Puerto Rico, during the audit. The Treasurer stated he was unaware that the Committee had accepted any corporate contributions and felt that these had been accepted due to clerical oversight.

Recommendation

We recommended that the Committee refund these contributions to the parties involved and furnish documentary evidence of the refunds to the Audit staff within 30 days of receipt of this letter.

D. Reporting of Committee Activity Under Candidate's Name

Sections 434(a)(1) and (b) of Title 2, United States Code, require political committees supporting candidate(s), and each candidate for election to Federal office, to file with the Commission reports containing information on their receipts, expenditures, and beginning and ending cash.

8004224312

During the course of our audit it was determined that the Committee's receipt and expenditure activity, except for \$50 in receipts, had been reported to the Commission on reports reflecting only the Candidate's name. In discussions with the Treasurer it was determined that the Candidate raised and spent no funds himself, and that all campaign-related activity occurred through the Committee. Information on Committee receipt and expenditure activity was sent to the Resident Commissioner's office in Washington where the FEC reports were prepared and filed under the Candidate's name.

We recommended that the Committee and the Candidate submit comprehensive amendments for 1976 transferring all campaign activity from Candidate reports to reports properly reflecting the activity under the name of the Committee. On February 1, 1978, we received comprehensive amendments from the Candidate and the Committee correctly reflecting the transfer of receipt and expenditure activity totals from the Candidate to the Committee.

Recommendation

Because the Committee has satisfactorily complied with our recommendation, no further action on this finding will be recommended.

E. Reporting of Debts and Obligations

Section 434(b)(12) of Title 2, United States Code, states that reports filed by political committees shall disclose the amount and nature of debts and obligations owed by the committee, and requires that these debts and obligations be continuously reported until extinguished, together with a statement of circumstances under which they were extinguished.

Section 104.8(b) of Title 11, Code of Federal Regulations, requires in part, that a debt, obligation, or other promise to pay in excess of \$500 be reported as of the time of the transaction.

Our examination of Committee records revealed an undisclosed obligation to the Committee's media firm which attained reportable status as of July 31, 1976, and which required continuous reporting through the year-end 1976 report at which time the balance owed was \$7,943.83. Since that time, the Committee has made no additional payments on this obligation. At no time during this period did the Committee or the Candidate disclose this obligation in its reports to the Commission. The Treasurer indicated this omission was due to a misunderstanding of the reporting requirements for debts and obligations.

80010224213

On February 1, 1978, the Committee filed a report (as of September 30, 1977) disclosing the obligation on Schedule C as required.

Recommendation

We recommended that the Committee, within 30 days of receipt of this letter, file a comprehensive amendment for 1976 to include the appropriate Schedule C, disclosing the total obligation, payments to date, and balance outstanding on the above-mentioned obligation. Furthermore, the Committee was advised that it must continue to file reports until the debt is extinguished (in accordance with Section 434(b)(12) of Title 2 of the United States Code), and that any settlement of the obligation with the corporate vendor at less than the value of the services is subject to Commission review, (per Section 114.10(c)(3) of Title 11, Code of Federal Regulations).

F. Itemization of Contributions

Section 434(b)(2) of Title 2, United States Code, requires a committee to include in its reports the full name and address, occupation and principal place of business of each person making a contribution(s) in excess of or aggregating in excess of \$100 within a calendar year, together with the amount and date of such contribution(s).

Our review of the Committee's available receipt records revealed nine (9) contributions from as many contributors in excess of \$100 or aggregating in excess of \$100 which were not itemized by the Committee as required in its reports. These contributions ranged in amount from \$50 to \$500 and totalled \$1,400. The Treasurer attributed these omissions to clerical oversight in the preparation of the reports.

In addition, of the 31 contributions itemized on the Candidate's reports:

- a) 3 contributions (9.67%) failed to reflect an address,
- b) 11 contributions (35.48%) failed to reflect the individual's occupation,
- c) 19 contributions (61.29%) failed to reflect the individual's principal place of business.

We recommended that the Committee file a comprehensive amendment for 1976 itemizing the previously omitted contributions, and reflecting the omitted address, occupation, and principal place of business information for those itemized contributions noted above. On February 1, 1978, we received the Committee's comprehensive amendment which materially complied with our recommendation.

80040324214

Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

G. Reporting and Itemization of Expenditures

Section 434(b)(9) and (11) of Title 2, United States Code, requires that a committee disclose in its reports the identification of each person to whom expenditures have been made by such committee within the calendar year in an aggregate amount in excess of \$100, the amount, date and purpose of each such expenditure; and, the total sum of expenditures made by such committee during the calendar year.

During the course of the audit, our examination of the Committee's expenditures revealed 12 expenditures in excess of \$100 which the Committee neither itemized as required, nor included in its total reported expenditures. These 12 expenditures (36.36% of the total number of itemizable expenditures) ranged in amount from \$411 to \$3,000 and totalled \$13,146 (35.13% of total itemizable expenditures). The Treasurer attributed these omissions to a lack of co-ordination between the campaign office in San Juan and the Resident Commissioner's office in Washington where the FEC reports were prepared.

We recommended that the Committee file a 1976 comprehensive amendment itemizing these previously omitted expenditures and adjusting its year-to-date totals accordingly. On February 1, 1978, the Committee filed its comprehensive amendment for 1976 including the expenditures noted above.

Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

H. Disclosure of Committee Depository

Section 433(b)(9) of Title 2, United States Code, requires that a committee reveal in its statement of organization a listing of all banks, safety deposit boxes, or other repositories used by the committee.

80010224215

Our review of the Committee's bank records revealed the use of a depository which was not reported as required by the Committee on its Statement of Organization, in any amendments submitted thereto, nor on the Statement of Candidate. Furthermore, the depository disclosed by the Candidate on his Statement of Candidacy and the Committee in its Statement of Organization was never used by the Committee during the period under audit.

Recommendation

We recommended that the Committee file an amended Statement of Organization disclosing the depository used within 30 days of receipt of this letter. We also recommended that the Candidate file an amended Statement of Candidacy designating the account as the Committee depository.

I. Disclosure of Fundraising Activity

Section 434(b)(6)(A) and (B) of Title 2, United States Code, requires that reports filed by committees under the Act shall disclose the total amount of proceeds from the sale of tickets to each dinner, rally, and other fundraising event, and mass collections made at such events.

During the course of our audit, it was determined that a major fundraising banquet was held by the Committee in September 1976, at the Caribe Hilton, San Juan, which was not disclosed by the Committee as required on Schedule D. The Treasurer stated that a deposit of \$12,410 made to the Committee's account on September 17, 1976, represented the bulk of proceeds collected from the dinner.

We recommended that the Committee file its 1976 comprehensive amendment to include the appropriate Schedule D disclosing the total of proceeds from the fundraising activity referred to above. On February 1, 1978, the Committee filed its 1976 comprehensive amendment disclosing the fundraiser as recommended.

J. Filing of Reports in Non-Election Year

Sections 104.1(a), (c)(2) and (c)(3)(i) of Title 11, Code of Federal Regulations, require each political committee to file quarterly reports of contributions and expenditures until all debts and obligations relating to that committee's Federal election activity are extinguished and the committee has filed a valid Notice of Termination. In any non-election year such committee shall only be required to file quarterly reports for a calendar quarter during which contributions received or expenditures made, when added together, exceed \$5,000.

80040324216

If the level of activity does not exceed \$5,000 per calendar quarter, the political committee shall notify the Commission on FEC Form 3a, or by letter containing the same information, at the close of the first quarter in which the exemption applies.

Our review of the Committee's reports filed with the Commission revealed no FEC Form 3a or letter equivalent filed by the Committee for the first quarter 1977. Bank records for the period indicated \$9.00 of expenditure activity and no receipt activity.

Recommendation

We recommended that the Committee file the omitted FEC Form 3a for the first quarter of 1977 within 30 days of receipt of this letter.

K. Other Matters

Noted below is a matter for which the Audit staff feels no further action is required by the Committee:

Our examination of the Committee's solicitation literature, consisting of a mass mailing letter and a newspaper ad solicitation, revealed that neither contained the notification required by Section 435(b) of Title 2 of the United States Code. The Committee was advised of the required notification for all solicitation literature in accordance with this section of the Act.

80040224217

ATTACHMENT I

COMITE AMIGOS DE JAIME BENITEZ
SCHEDULE OF APPARENT CORPORATE CONTRIBUTIONS

<u>CONTRIBUTOR</u>	<u>DATE</u>	<u>AMOUNT</u>	<u>DATE OF INCORPORATION</u>
1) Lube Construction Corp. Hato Rey, P.R.	6/76	\$ 40.00	1/16/69
2) Esteban Huertas, Inc. Box 792 Caguas, P.R.	6/76	20.00	3/2/73
3) Robert F. McCloskey Associates, Inc.	9/20/76	200.00	8/9/73
4) Underwear Corp. GPO Box 2947 San Juan, P.R. 00936 (listed under "Grana Corp." in Secretary of State's records)	8/26/76	50.00	11/17/64
	TOTAL	\$310.00	

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Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office

HC PRO0017

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Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with their campaign shall submit this report to the appropriate officials with respect to each election.

1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed Jaime Benitez (357655)	2 Identification Number Puerto Rico PRO001
(b) Address (number and street) P. O. Box 5629	3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(c) City, State and ZIP code San Juan, P. R. - 00905	(b) If "Yes" for which election? General Primary Runoff (Date)

4 Type of Report (Check appropriate box and complete, if applicable) (a) <input checked="" type="checkbox"/> Amendment for 1976 (b) <input type="checkbox"/> July 10 Quarterly Report which report (c) <input type="checkbox"/> October 10 Quarterly Report	(d) <input type="checkbox"/> January 31 Year End Report (e) <input type="checkbox"/> Monthly Report (Months) (f) <input type="checkbox"/> Termination Report
(h) <input type="checkbox"/> Tenth-day report preceding election on _____ in the State of _____ (Primary, general, or convention) (Date)	
(i) <input type="checkbox"/> Thirtieth-day report following election on _____ in the State of _____ (Primary, general, or convention) (Date)	

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period From **1/1/76** Through **12/31/76**

Section A - Cash Balance Summary

	Column A This Period	Column B Carried Forward
6 Cash on hand January 1, 1976 - Comprehensive Amendment - Adjustments	\$ 0	\$ 0
7 Cash on hand at beginning of reporting period	\$ 0	\$ 0
8 Total receipts (From line 10)	\$ 0	\$ 0
(a) Subtotal (Add lines 7 and 8)	\$ 0	\$ 0
9 Total expenditures (From line 25)	\$ 0	\$ 0
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 0	\$ 0
11 Contributed items on hand to be liquidated (attach itemized list)	\$	\$

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary
(To Be Used Only By Presidential Candidates Receiving Federal Funds)

12 Operating expenditures (From line 20)	\$	\$
13 Refunds and Recates (From line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation	\$	\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)	\$	\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.

Jaime Benitez

(Type name of Treasurer of Candidate)

Jaime Benitez
(Signature of Treasurer of Candidate)

1-24-73

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g or 441, from reverse side of form.

For further
information
contact:

Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463

Any information reported therein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

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Detailed Summary Schedule of Receipts and Expenditures
 (Page 2)

Name of Candidate or Committee	PERIOD COVERING THE PERIOD	
	THRU	THRU
	1-1-76	12-31-76
Name of Candidate or Committee: <u>Jafre Benitez</u>		
PART I - RECEIPTS - Comprehensive Amendment - Adjustments		
15 Contributions and other income	Column A This Period	Column B Calendar year to date
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Sales and Collections Included Above List by event on memo Schedule D (S) _____		
(d) Subtotal of contributions and other income	\$ (29,678.38)	\$ -----0-----
16 Loans and Loan Repayments Received		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$	\$
17 Refunds, Rebates, Returns Received		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns	\$	\$
18 Transfers In		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$	
(b) From Other Committees (Itemize on Schedule A Regardless of Amount)	\$	
(c) Subtotal of transfers in	\$	\$
19 Total Receipts	\$ (29,678.38)	\$ -----0-----
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Also Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures)		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of operating expenditures	\$	\$
21 Independent Expenditures (use Schedule B)	\$ (24,405.25)	\$ -----0-----
22 Loans, Loan Repayments, and Contribution Refunds Made		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds: Exempt Fundraising, Legal and Accounting Expenditures		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of fundraising expenditures	\$	\$
24 Transfers Out		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$	
(c) Subtotal of transfers out	\$	\$
25 Total Expenditures	\$ (24,405.25)	\$ -----0-----
PART III - DEBITS AND OBLIGATIONS		
26 Debits and obligations owed to the Committee (Itemize all on Schedule C)	\$	
27 Debits and obligations owed by the Committee (Itemize all on Schedule C)	\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$	
29 Transfers in (from line 18(a))	\$	
30 Net Receipts (Subtract line 29 from line 28)	\$	
31 Total Expenditures (from line 25)	\$	
32 Transfers out (from line 24(a))	\$	
33 Net Expenditures (Subtract line 32 from line 31)	\$	

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Schedule A

July 1976
Federal Election Commission
1325 N Street, N.W.
Washington, D.C. 20543

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**

See instructions on back

Page 1 of 7 for

LINE NUMBER 15 (a)

(Use separate schedule for each contribution item)

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6
4
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1

Name of Contributor or Committee in Full		Date (month, day, year)	Amount of each receipt (this period)
Comite Amigos de Jaime Benitez - Amendment			
Full Name, mailing address and ZIP code	Lakeshore Court, P.O. Padria St., Miramar, Puerto Rico	6-5-76	200.00
Principal place of business	Director <small>Check if Contributor is self-employed</small> Aggregate Year-to-date \$ 200.00		
Full Name, mailing address and ZIP code	G.P.O. Box 2050 San Juan, Puerto Rico 00905	6-5-76	200.00
Principal place of business	Director NAPA - TV Guaynabo, P.R. <small>Check if Contributor is self-employed</small> Aggregate Year-to-date \$ 200.00		
Full Name, mailing address and ZIP code	Washington 1 Condado, San Juan, P.R. 00907	6-5-76	200.00
Principal place of business	President Caguas Federal <small>Check if Contributor is self-employed</small> Aggregate Year-to-date \$ 200.00		
Full Name, mailing address and ZIP code	Apartado 258 Hato Rey, Puerto Rico 00919	6-5-76	200.00
Principal place of business	President Tres Monjitas Dairy <small>Check if Contributor is self-employed</small> Aggregate Year-to-date \$ 200.00		
Full Name, mailing address and ZIP code	Colegio Universitario de Cayey Cayey, Puerto Rico	10-1-76	50.00
Principal place of business	Professor Colegio Universitario de Cayey <small>Check if Contributor is self-employed</small> Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code	King's Court 52, Apt 1-A Condado, P.R. 00911	9-5-76	100.00
Principal place of business	Writer University of P.R. <small>Check if Contributor is self-employed</small> Aggregate Year-to-date \$		
Subtotal of receipts this page (optional)			\$ 950.00
Total this period (last page this line number only)			\$

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See instructions on back)

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Name of Candidate or Committee on file		Date (month, day, year)	Amount of each receipt (this period)
COMITE AMIGOS DE JAIME BENITEZ - Amendment			
Full Name, mailing address and ZIP code	Condominio B Mirador Penthouse George, Barbara & Lawrence Rogan Ashford Ave. Condado, P.R.	7-10-76	1,000.00
Principal place of business	Occupation Businessman <small>Check if Contributor is self-employed</small> Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Gloria & David Kaplan 163 Mimosa St. Santa Maria, Rio Piedras, P.R.	7-10-76	200.00
Principal place of business	Occupation Realtors <small>Check if Contributor is self-employed</small> Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Diego Sorroche	7-17-76	180.00
Principal place of business	Occupation Manager - Casino <small>Check if Contributor is self-employed</small> Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Augusto Bohonis 7 Marbella St. 62 Santurce, Puerto Rico	9-15-76	100.00
Principal place of business	Occupation Professor <small>Check if Contributor is self-employed</small> Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Mr. Iglesias	6-76	200.00
Principal place of business	Occupation Iglesias, Vazquez & Associates Canals St. 270, Santurce, PR. <small>Check if Contributor is self-employed</small> Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Luis Villafañe Hipodromo St. 610 Santurce, P.R.	8-25-76	500.00
Principal place of business	Occupation Businessman & Investor <small>Check if Contributor is self-employed</small> Aggregate Year-to-date ▶ \$		
Subtotal of receipts (this page optional)			▶ \$2,180.00
Total this period (last page this line number only)			▶ \$

Schedule A

July 1976
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20541

Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See Instructions on back)

Page 3 of 7 for

LINE NUMBER 15

(Use separate schedule for each numbered line)

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Name of Contributor (Last, first or full)		Date (month, day, year)		Amount of each receipt for this period
COMITE AMIGOS DE JAIME BENITEZ - Amendment				
Full Name, mailing address and ZIP code Mr. & Mrs. Jorge El Koury 2009 Magnolia St. Monteflores, Santurce, P.R.		9-13-76		200.00
Principal place of business University of P.R. (her)		Occupation Realtor		Check if Contributor is self-employed Aggregate Year to date ▶ \$ 200.00
Full Name, mailing address and ZIP code Mrs. Catherine J. de Antonetti Mansiones de Garden Hills, #1 St. #E-17, Guaynabo, P.R.		9-14-76		300.00
Principal place of business Mansiones de Garden Hills 1 St. E-17, Guaynabo, P.R.		Occupation Housewife		Check if Contributor is self-employed Aggregate Year to date ▶ \$ 300.00
Full Name, mailing address and ZIP code Mrs. Monique Lacombe 1407 Ashford Avenue Cordado, P. R.		9-15-76		200.00
Principal place of business		Occupation Advertising Agency		Check if Contributor is self-employed Aggregate Year to date ▶ \$ 200.00
Full Name, mailing address and ZIP code Mrs. Luz de Selenia Siaca Patio Hill 12, Torrimar Guaynabo, P.R.		9-13-76		500.00
Principal place of business University of Puerto Rico		Occupation Proffesor		Check if Contributor is self-employed Aggregate Year to date ▶ \$ 500.00
Full Name, mailing address and ZIP code Mrs. Petroamérica Pagán 2007 Las Violetas St. Santurce, P.R.		9-15-76		150.00
Principal place of business		Occupation Labor relations consultant		Check if Contributor is self-employed Aggregate Year to date ▶ \$ 150.00
Full Name, mailing address and ZIP code Dra. Elsa Castro Perez 1514 Bori St. Rio Piedras, PR.		9-14-76		300.00
Principal place of business University of Puerto Rico		Occupation Proffesor		Check if Contributor is self-employed Aggregate Year to date ▶ \$ 300.00
Subtotal of receipts this page (optional)				▶ \$ 1,650.00
Total this period (last page this line number only)				▶ \$

Schedule A

July 1976
Federal Election Commission
1375 N Street, N.W.
Washington, D.C. 20543

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See instructions on back)

Page 4 of 7

LINE NUMBER 15

(Use separate sheet for each numbered line)

Name of Candidate or Committee in full

COMITE AMIGOS DE JAIME BENITEZ - Amendment

Full Name, mailing address and ZIP code

Juan F. Doval

31 Fresa St.
Milaville, Rio Piedras, P.R.

Date (month,
day, year)

9-15-76

Amount of each
receipt (in dollars)

200.00

Principal place of business

Occupation

Check if Contributor is self-employed
Aggregate Year-to-date ▶ \$ 200.00

Full Name, mailing address and ZIP code

Manuel Godfrez

18 Dalia St.
Isla Verde, P.R.

Date (month,
day, year)

9-8-76

Amount of each
receipt (in dollars)

150.00

Principal place of business

Occupation

Hotel - business

Check if Contributor is self-employed
Aggregate Year-to-date ▶ \$ 150.00

Full Name, mailing address and ZIP code

Dr. & Mrs. Pedro José Rivera

Carr Cupey Alto, Km. 2.4
Rio Piedras, P.R.

Date (month,
day, year)

9-10-76

Amount of each
receipt (in dollars)

250.00

Principal place of business

Occupation

Consultant

- Retired

Check if Contributor is self-employed
Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Mrs. Isabel Laguna de Colorado

821 Vesta St., Dos Pinos
Rio Piedras, P.R.

Date (month,
day, year)

9-12-76

Amount of each
receipt (in dollars)

150.00

Principal place of business

Occupation

Social Worker

Retired

Check if Contributor is self-employed
Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Dra. Mercedes Stefani

652 Roosevelt St.
Santurce, P.R.

Date (month,
day, year)

9-13-76

Amount of each
receipt (in dollars)

150.00

Principal place of business

Occupation

Doctor

Ashford Medical Center

Check if Contributor is self-employed
Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Mrs. Hilda Villamil

305 Harvard St., Univ. Gardens
Rio Piedras, P.R.

Date (month,
day, year)

9-12-76

Amount of each
receipt (in dollars)

150.00

Principal place of business

Occupation

Professor

University of Puerto Rico

Check if Contributor is self-employed
Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional)

▶ \$ 1,050.00

Total this period (last page this line number only)

▶ \$

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Schedule A

July 1976
Federal Election Commission
1325 N. Street, N.W.
Washington, D.C. 20543

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See instructions on back)

Page 5 of 7 for
LINE NUMBER 15
(Use separate sheets for each numbered line)

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Name of Contributor or Committee (Full)			
COMITE AMIGOS DE JAIME BENITEZ - Amendment			
Full name, mailing address and ZIP code	P. O. Box 10786 Caparra Heights Sta. San Juan, Puerto Rico 00922	Date (month, day, year)	Amount of each receipt of this period
		9-15-76	200.00
Principal place of business	Occupation	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Full name, mailing address and ZIP code	G.P.O.Box 71328 San Juan, Puerto Rico 00936	Date (month, day, year)	Amount of each receipt of this period
		9-21-76	250.00
Principal place of business	Occupation	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Full name, mailing address and ZIP code	Mrs. Marta Balzac 218 Hasting Street, Garden Hills Guaynabo, P.R.	Date (month, day, year)	Amount of each receipt of this period
		9-15-76	200.00
Principal place of business	Occupation Housewife	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Full name, mailing address and ZIP code	Mr. & Mrs. Benjamin Betancourt 38 Cascada St., Munoz Rivera Urb. Guaynabo, PR	Date (month, day, year)	Amount of each receipt of this period
		9-14-76	250.00
Principal place of business	Occupation	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Full name, mailing address and ZIP code	George Kogan 1130 Muñoz Rivera Ave. Rio Piedras, P.R.	Date (month, day, year)	Amount of each receipt of this period
		9-14-76	200.00
Principal place of business	Occupation Businessman	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Full name, mailing address and ZIP code	Jose E. Alegria 1309 Magdalena Ave. Santurce, P.R. 00907	Date (month, day, year)	Amount of each receipt of this period
		9-15-76	500.00
Principal place of business	Occupation Bankers	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Subtotal of receipts this page (top of each)			▶ \$ 1,600.00
Total this period (last page this line number only)			▶ \$

Schedule A

July 1976
 Federal Election Commission
 1325 M Street, N.W.
 Washington, D.C. 20541

Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See instructions on back)

Page 6 of 7 for

LINE NUMBER 15

(Use separate schedule for each numbered line)

Name of Contributor or Committee on File		Date (month, day, year)	Amount of each receipt of this period
COMITE AMIGOS DE JAIME BENITEZ - Amendment			
Full Name, mailing address and ZIP code	1370 Luchetti St. Condado, P.R. 00907	9-13-76	200.00
Principal place of business	Occupation Housewife <small>Check if Contributor is self-employed</small> Appropriate Year to Date ▶ \$		
Full Name, mailing address and ZIP code	Diego Sorroche 3 St. Block G-7 Rio Piedras, P.R.	9-14-76	100.00
Principal place of business	Occupation Manager- Casino <small>Check if Contributor is self-employed</small> Appropriate Year to Date ▶ \$		
Full Name, mailing address and ZIP code	Placido Gonzalez Centro Comercial San Antonio Inc. Apartado 1161, Caguas, P.R.	10-18-76	500.00
Principal place of business	Occupation Businessman <small>Check if Contributor is self-employed</small> Appropriate Year to Date ▶ \$ 500.00		
Full Name, mailing address and ZIP code	Rafael Elvira Villa St. Corner Mendez Vigo #128 Ponce, P.R.	10-14-76	200.00
Principal place of business	Occupation Singer <small>Check if Contributor is self-employed</small> Appropriate Year to Date ▶ \$ 200.00		
Full Name, mailing address and ZIP code	Harold Toro Toro) Diana St. 831 Rio Piedras, P.R.	9-7-76	100.00
Principal place of business	Occupation Lawyer <small>Check if Contributor is self-employed</small> Appropriate Year to Date ▶ \$		
Full Name, mailing address and ZIP code	Francisco Acevedo & Mrs. G-N Wilson St. Rio Piedras, P.R.	9-15-76	50.00
Principal place of business	Occupation Lawyer <small>Check if Contributor is self-employed</small> Appropriate Year to Date ▶ \$		
Subtotal of receipts this page (optional)			▶ \$ 1,150.00
Total this period (last page this line number only)			▶ \$

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Schedule A

July 1976
Federal Election Commission
1225 N. STREET, N.W.
WASHINGTON, D.C. 20543

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See instructions on back)

Page 7 of 7 for

LINE NUMBER 15

(Use separate schedule(s) for each numbered line)

Name of Contributor or Committee in Full		Date (month, day, year)	Amount of each receipt for this period
COMITE AMIGOS DE JAIME BENITEZ - Amendment			
Full name, mailing address and ZIP code Jose Raul Cancio		10-26-76	250.00
Principal place of business	Occupation		
Banco de Economias Bldg Suite 1616 Hato Rey, P.R.	Attorney		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date ▶ \$ 250.00			
Full name, mailing address and ZIP code Gilberto Mayo Aguayo		10-26-76	250.00
Principal place of business	Occupation		
Banco de Economias - Suite 1616, Hato Rey, P.R.	Attorney		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date ▶ \$ 250.00			
Full name, mailing address and ZIP code Enrique Campos del Toro		10-27-76	500.00
Principal place of business	Occupation		
First Federal Savings - Ponce de Leon Ave, Stop 23 Sanjurjo, P.R.	Banker		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date ▶ \$ 500.00			
Full name, mailing address and ZIP code Popular Democratic Party (Expenses paid on behalf of the candidate)			
Principal place of business	Occupation		
Ponce de Leon Ave. San Juan, P.R.			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date ▶ \$			
Full name, mailing address and ZIP code			
Principal place of business	Occupation		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date ▶ \$			
Full name, mailing address and ZIP code			
Principal place of business	Occupation		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date ▶ \$			
Subtotal of receipts this page (optional)			▶ \$ 1,000.00
Total this period (last page this line number only)			▶ \$ 9,580.00

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FEC Form 3
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

REG-119-634

1(a) Name of Candidate or Committee (in full) - Check if name or address is changed Comite Amigos de Jaime Benitez		2 Identification Number Puerto Rico 057665	
1(b) Address (number and street) 75 Condado Avenue		3(a) Is this a report of receipts and expenditures for only one election? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
1(c) City, State and ZIP code Condado, Santurce, Puerto Rico - 00907		1(b) If "Yes," for which election? _____ on _____ (date) (general, primary, runoff)	
4 Type of Report (Check appropriate box and complete, if applicable) (a) <input checked="" type="checkbox"/> Amendment For 1976 (Which report?) (b) <input type="checkbox"/> April 10 Quarterly Report (c) <input type="checkbox"/> July 10 Quarterly Report (d) <input type="checkbox"/> October 10 Quarterly Report (e) <input type="checkbox"/> Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date) (f) <input type="checkbox"/> Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)		(a) <input type="checkbox"/> January 31 Year End Report (f) <input type="checkbox"/> Monthly Report (Month) _____ (g) <input type="checkbox"/> Termination Report	

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From 1-1-76 Through 12-31-76		Column A This Period	Column B Calendar Year To Date
Section A - Cash Balance Summary			
6 Cash on hand January 1, 1976	Comprehensive Amendments-Adjustments		\$ -0-
7 Cash on hand at beginning of reporting period		\$ -0-	
8 Total receipts (from line 19)		\$ 37,312.99	\$ 37,312.99
1(a) Subtotal (Add lines 7 and 8)		\$ 37,812.99	\$ 37,812.99
9 Total expenditures (From line 25)		\$ 37,578.58	\$ 37,578.58
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)		\$ 234.41	\$ 234.41
11 Contributed items on hand to be liquidated (attach itemized list)		\$	

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)

12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.

José E. Alegria
(Typed Name of Treasurer or Candidate)

José E. Alegria
(Signature of Treasurer or Candidate)

1-24-78
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. : 437g or (b)(1). (See reverse side of form)

For further information Contact:

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

997-10224228

Detailed Summary Schedule of Receipts and Expenditures
 (Page 2)

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Name of Candidate or Committee Comité Amigos de Jaime Benitez		REPORT COVERING THE PERIOD FROM 1-1-76 TO 12-31-76	
PART I - RECEIPTS <u>Comprehensive Amendment Adjustments</u>		Column A This Period	Column B Calendar year-to-date
15 Contributions and other income:			
(a) Itemized (use Schedule A)	\$ 9,580.00		
(b) Unitemized	\$ 23,232.99		
(c) Sales and Collections Included Above List by event on memo Schedule D IS _____			
(d) Subtotal of contributions and other income	\$ 37,812.99	\$	37,812.99
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments received	\$	\$	
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of refunds, rebates, returns	\$	\$	
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$		
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$		
(c) Subtotal of transfers in	\$	\$	
19 Total Receipts	\$ 37,812.99	\$	37,812.99
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds include Fundraising, Legal and Accounting Expenditures)			
(a) Itemized (use Schedule B)	\$ 37,551.25		
(b) Unitemized	\$ 27.33		
(c) Subtotal of operating expenditures	\$ 37,578.58	\$	37,578.58
21 Independent Expenditures (use Schedule E)		\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$	
23 For Use Only By Presidential Campaigns Receiving Federal Funds, Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)	\$		
(b) Unitemized	\$		
(c) Subtotal of fundraising expenditures	\$	\$	
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$		
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$		
(c) Subtotal of transfers out	\$	\$	
25 Total Expenditures	\$ 37,578.58	\$	37,578.58
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C (See 9-30-77 Report))		\$ 7,943.83	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$	
29 Transfers In (from line 18(a))		\$	
30 Net Receipts (Subtract line 29 from line 28)		\$	
31 Total Expenditures (from line 25)		\$	
32 Transfers out (from line 24(a))		\$	
33 Net Expenditures (Subtract line 32 from line 31)		\$	

Schedule A

July 1976
Federal Election Commission
1325 N Street, N.W.
Washington, D.C. 20543

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**

(See instructions on back)

Page 1 of 7 for
LINE NUMBER 15 (a)

(Use separate schedules for each numbered line)

Name of Candidate or Committee in full			
Comite Amigos de Jaime Benitez - Amendment			
Full Name, mailing address and ZIP code	Arturo Roque Lakeshore Cond. P.O. Madrid St. Miramar, Puerto Rico	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation Director	6-5-76	200.00
	Check if Contributor is self-employed		
	Aggregate Year-to-date		▶ \$ 200.00
Full Name, mailing address and ZIP code	Hector L. Modesti G.P.O. Sox 2050 San Juan, Puerto Rico 00905	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation Manager	6-5-76	200.00
	Check if Contributor is self-employed		
	Aggregate Year-to-date		▶ \$ 200.00
Full Name, mailing address and ZIP code	José M. Feliciano Washington 1 Condado, San Juan, P.R. 00907	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation President	6-5-76	200.00
	Check if Contributor is self-employed		
	Aggregate Year-to-date		▶ \$ 200.00
Full Name, mailing address and ZIP code	Jeronimo Fonalleda Apartado 258 Hato Rey, Puerto Rico 00919	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation President	6-5-76	200.00
	Check if Contributor is self-employed		
	Aggregate Year-to-date		▶ \$ 200.00
Full Name, mailing address and ZIP code	Marcos José Laborde Maristany & Sra. Cayey, Puerto Rico Colegio Universitario de Cayey	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation Proffesor	10-1-76	50.00
	Check if Contributor is self-employed		
	Aggregate Year-to-date		▶ \$
Full Name, mailing address and ZIP code	Salvador Tió Montes de Oca King's Court 52, Apt 1-A Condado, P.R. 00911	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation Writer	9-5-76	100.00
	Check if Contributor is self-employed		
	Aggregate Year-to-date		▶ \$
Subtotal of receipts this page (foot-note)			▶ \$ 950.00
Total this period (last page this line number only)			▶ \$

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Schedule A

July 1976
Federal Election Commission
1225 M Street, N.W.
Washington, D.C. 20543

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See instructions on back)

Page 2 of 7 for

LINE NUMBER 15

(Use separate schedule(s) for each numbered line)

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Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt of this period
COMITE AMIGOS DE JAIME BENITEZ - Amendment			
Full Name, mailing address and ZIP code	Condominio B Mirador Penthouse George, Barbara & Lawrence Rogan Ashford Ave. Condado, P.R.	7-10-76	1,000.00
Principal place of business	Occupation Businessman <input type="checkbox"/> Check if Contributor is self employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Gloria & David Kaplan 163 Mimosa St. Santa Maria, Rio Piedras, P.R.	7-10-76	200.00
Principal place of business	Occupation Realtors <input type="checkbox"/> Check if Contributor is self employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Diego Sorroche	7-17-76	180.00
Principal place of business	Occupation Manager - Casino <input type="checkbox"/> Check if Contributor is self employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Augusto Bobonis Marbella St. 62 Santurce, Puerto Rico	9-15-76	100.00
Principal place of business	Occupation Professor <input type="checkbox"/> Check if Contributor is self employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Mr. Iglesias	6-76	200.00
Principal place of business	Occupation Iglesias, Vazquez & Associates Canals St. 270, Santurce, PR. <input type="checkbox"/> Check if Contributor is self employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Luis Villafañe Hipodromo St. 610 Santurce, P.R.	8-25-76	500.00
Principal place of business	Occupation Businessman & Investor <input type="checkbox"/> Check if Contributor is self employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)			▶ \$2,180.00
Total this period (last page this line number only)			▶ \$

Schedule A

July 1976
Federal Election Commission
1325 H Street, N.W.
Washington, D.C. 20542

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See instructions on back)

Page 3 of 7 for

LINE NUMBER 15

(Use separate schedule for each numbered line)

Name of Candidate or Committee in full			
COMITE AMIGOS DE JAIME BENITEZ - Amendment			
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period	
Mr. & Mrs. Jorge El Koury 2009 Magnolia St. Monteflores, Santurce, P.R.	9-13-76	200.00	
Principal place of business	Occupation		
University of P.R. (her)	Realtor		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date		▶ \$ 200.00	
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period	
Mrs. Catherine J. de Antonetti Mansiones de Garden Hills, #1 St. =E-17, Guaynabo, PR..	9-14-76	300.00	
Principal place of business	Occupation		
Mansiones de Garden Hills 1 St. E-17, Guaynabo, P.R.	Housewife		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date		▶ \$ 300.00	
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period	
Mrs. Monique Lacombe 1309 Magdalena Ave. Apt M-11 Santurce, P.R.	9-15-76	200.00	
Principal place of business	Occupation		
1407 Ashford Avenue Condado, P. R.	Advertising Agency		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date		▶ \$ 200.00	
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period	
Mrs. Luz de Selenia Siaca Patio Hill 12, Torrimar Guaynabo, P.R.	9-13-76	500.00	
Principal place of business	Occupation		
University of Puerto Rico	Proffesor		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date		▶ \$ 500.00	
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period	
Mrs. Petroamérica Pagán 2007 Las Violetas St. Santurce, P.R.	9-15-76	150.00	
Principal place of business	Occupation		
	Labor relations consultant		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date		▶ \$ 150.00	
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period	
Dra. Elsa Castro Perez 1514 Bori St. Rio Piedras, PR.	9-14-76	300.00	
Principal place of business	Occupation		
University of Puerto Rico	Proffesor		
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-to-date		▶ \$ 300.00	
Subtotal of receipts this page (optional)		▶ \$ 1,650.00	
Total this period (last page this line number only)		▶ \$	

80010324332

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See instructions on back)

Page 4 of 7 for
LINE NUMBER 15
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt (this period)
COMITE AMIGOS DE JAIME BENITEZ - Amendment			
Full Name, mailing address and ZIP code Juan F. Doval	31 Fresa St. Milaville, Rio Piedras, P.R.	9-15-76	200.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 200.00		
Full Name, mailing address and ZIP code Manuel Godínez	18 Dalia St. Isla Verde, P.R.	9-8-76	150.00
Principal place of business	Occupation Hotel - business <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 150.00		
Full Name, mailing address and ZIP code Dr. & Mrs. Pedro José Rivera	Carr Cupey Alto, Km. 2.4 Rio Piedras, P.R.	9-10-76	250.00
Principal place of business	Occupation Consultant <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code Mrs. Isabel Laguna de Colorado	S21 Vesta St., Dos Pinos Rio Piedras, P.R.	9-12-76	150.00
Principal place of business	Occupation Social Worker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code Dra. Mercedes Stefani	652 Roosevelt St. Santurce, P.R.	9-13-76	150.00
Principal place of business	Occupation Doctor <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code Mrs. Hilda Villamil	305 Harvard St., Univ. Gardens Rio Piedras, P.R.	9-12-76	150.00
Principal place of business	Occupation Profressor <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts (this page optional)			▶ \$ 1,050.00
Total this period (last page this line number only)			▶ \$

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**Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

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Name of Candidate or Committee in full			
COMITE AMIGOS DE JAIME BENITEZ - Amendment			
Full Name, mailing address and ZIP code	P. O. Box 10786 Caparra Heights Sta. San Juan, Puerto Rico 00922	Date (month, day, year) 9-11-76	Amount of each receipt in this period 200.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	G.P.O. box 71328 San Juan, Puerto Rico 00936	Date (month, day, year) 9-21-76	Amount of each receipt in this period 250.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Mrs. Marta Balzac 218 Hasting Street, Garden Hills Guaynabo, P.R.	Date (month, day, year) 9-15-76	Amount of each receipt in this period 200.00
Principal place of business	Occupation Housewife <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Mr. & Mrs. Benjamin Betancourt 38 Cascada St., Munoz Rivera Urb. Guaynabo, PR	Date (month, day, year) 9-14-76	Amount of each receipt in this period 250.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	George Kogan 1130 Muñoz Rivera Ave. Rio Piedras, P.R.	Date (month, day, year) 9-14-76	Amount of each receipt in this period 200.00
Principal place of business	Occupation Businessman <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Jose E. Alegría 1309 Magdalena Ave. Santurce, P.R. 00907	Date (month, day, year) 9-15-76	Amount of each receipt in this period 500.00
Principal place of business	Occupation Bankers <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)			▶ \$ 1,600.00
Total this period (last page this line number only)			▶ \$

**Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**
 (See Instructions on back)

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Name of Candidate or Committee in full COMITE AMIGOS DE JAIME BENITEZ - Amendment			
Full Name, mailing address and ZIP code Mrs. Sila S. Calderón 1370 Luchetti St. Condado, P.R. 00907		Date (month, day, year) 9-13-76	Amount of each receipt this period 200.00
Principal place of business 1370 Luchetti St. Condado, P.R.	Occupation Housewife <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code Diego Sorroche 3 St. Block G-7 Rio Piedras, P.R.		Date (month, day, year) 9-14-76	Amount of each receipt this period 100.00
Principal place of business Caribe Hilton	Occupation Manager- Casino <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code Placido Gonzalez Centro Comercial San Antonio Inc. Apartado 1161, Caguas, P.R.		Date (month, day, year) 10-18-76	Amount of each receipt this period 500.00
Principal place of business Centro Comercial San Antonio Inc Apartado 1161, Caguas, P.R.	Occupation Businessman <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00		
Full Name, mailing address and ZIP code Rafael Elvira Villa St. Corner Mendez Vigo #128 Ponce, P.R.		Date (month, day, year) 10-14-76	Amount of each receipt this period 200.00
Principal place of business Villa St. corner Mendez Vigo 128 Ponce, PR.	Occupation Singer <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 200.00		
Full Name, mailing address and ZIP code Harold Toro Toro) Diana St. 831 Rio Piedras, P.R.		Date (month, day, year) 9-7-76	Amount of each receipt this period 100.00
Principal place of business Diana St. 831 Dos Pinos, Rio Piedras, P.R.	Occupation Lawyer <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code Francisco Acevedo & Mrs. G-N Wilson St. Rio Piedras, P.R.		Date (month, day, year) 9-15-76	Amount of each receipt this period 50.00
Principal place of business G-N Wilson Rio Piedras, PR	Occupation Lawyer <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)			▶ \$ 1,150.00
Total this period (last page this line number only)			▶ \$

Schedule A

July 1976
Federal Election Commission
1325 M Street, N.W.
Washington, D.C. 20543

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 7 of 7 for

LINE NUMBER 15

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

COMITE AMIGOS DE JAIME BENITEZ - Amendment

Full Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Jose Raul Cancio Principal place of business: Banco de Economias Bldg Suite 1616 Hato Rey, P.R.	Attorney <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 250.00	10-26-76	250.00
Gilberto Mayo Aguayo Principal place of business: Banco de Economias Suite 1616, Hato Rey, P.R.	Attorney <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 250.00	10-26-76	250.00
Enrique Campos del Toro Principal place of business: First Federal Savings Ponce de Leon Ave, Stop 23 Santurce, P.R.	Banker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00	10-27-76	500.00
Popular Democratic Party (Expenses paid on behalf of the candidate) Principal place of business: Ponce de Leon Ave. San Juan, P.R.	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	Memo entry	(9,953.67)
Full Name, mailing address and ZIP code Principal place of business Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Full Name, mailing address and ZIP code Principal place of business Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Subtotal of receipts this page (optional)			▶ \$ 1,000.00
Total this period (last page this line number only)			▶ \$ 9,580.00

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FEC Form 3
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) Check if name or address changed since 1975
Comité Amigos de Jaime Benítez

2 Identification Number
Puerto Rico 057665

1(b) Address (number and street)
75 Condado Avenue

3(a) Is this a report of receipts and expenditures for only one election? Yes No

1(c) City, State and ZIP code
Santurce, Puerto Rico - 00907

3(b) If "Yes," for which election?
(general, primary, runoff) (date)

4 Type of Report (Check appropriate box and complete, if applicable)
(a) Amendment For 1977 (which report?)
(b) April 10 Quarterly Report
(c) July 10 Quarterly Report
(d) October 10 Quarterly Report
(e) January 31 Year End Report
(f) Monthly Report (month)
(g) Termination Report
(h) Tenth day report preceding election on _____ in the State of _____ (primary, general or convention) (date)
(i) Thirteenth day report following election on _____ in the State of _____ (primary, general or convention) (date)

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From 1-1-77 Through 9-30-77

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year To Date
6 Cash on hand January 1, 1977		\$ 234.41
7 Cash on hand at beginning of reporting period	\$ 234.41	
8 Total receipts (from line 19)	\$ -0-	\$ -0-
(a) Subtotal (Add lines 7 and 8)	\$ 234.41	\$ 234.41
9 Total expenditures (from line 25)	\$ 27.00	\$ 27.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 207.41	\$ 207.41
11 Contributed items on hand to be liquidated (attach itemized list)	\$	
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct, and complete.

José E. Alegria

(Type Name of Treasurer or Candidate)

José E. Alegria

(Signature of Treasurer or Candidate)

1-24-78

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g or 441. (See reverse side of form)

For further information contact:

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

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Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Name of Candidate or Committee	REPORT COVERING THE PERIOD	
Comité Amigos de Jaime Benitez	FROM 1-1-77	TO 9-30-77
	Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS		
15 Contributions and other income		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Sales and Collections Included Above		
List by event on memo Schedule D (S. _____)		
(d) Subtotal of contributions and other income	\$ -0-	\$ -0-
16 Loans and Loan Repayments Received		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$	\$
17 Refunds, Rebates, Returns Received		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns	\$	\$
18 Transfers In		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$	
(c) Subtotal of transfers in	\$	\$
19 Total Receipts	\$ -0-	\$ -0-
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures)		
(a) Itemized (use Schedule B)	\$ 27.00	
(b) Unitemized	\$	
(c) Subtotal of operating expenditures	\$ 27.00	\$ 27.00
21 Independent Expenditures (use Schedule E)	\$	
22 Loans, Loan Repayments, and Contribution Refunds Made		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of fundraising expenditures	\$	\$
24 Transfers Out		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$	
(c) Subtotal of transfers out	\$	\$
25 Total Expenditures	\$ 27.00	\$ 27.00
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$ 7,943.83	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$	
29 Transfers In (from line 18(a))	\$	
30 Net Receipts (Subtract line 29 from line 28)	\$ -0-	
31 Total Expenditures (from line 25)	\$ 27.00	
32 Transfers out (from line 24(a))	\$ -0-	
33 Net Expenditures (Subtract line 32 from line 31)	\$ 27.00	

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Schedule C

July 1976
Federal Election Commission
1275 M Street, N.W.
Washington, D.C. 20543

**Debts and Obligations for
Line Numbers 26 and/or 27 of FEC Form 3**

Page of for

LINE NUMBER 27

(Use separate schedule(s) for each numbered line)

(See Instructions on back)

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Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Comité Amigos de Jaime Benitez - Amendment				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
October 10, 1977 Report				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Monique Lacombe Advertising 1407 Ashford Avenue Condado, P. R. - 00907	June 1976 to Present	34,234.50	26,290.67	7,943.83
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Subtotals this period this page (optional)		\$	\$	\$
Total this period (last page this line number only)		\$ 34,234.50	\$ 26,290.67	\$ 7,943.83

Carry outstanding balance only, to appropriate line of summary.

Schedule D

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20543

**Itemized Receipts Sales and Collections
For Line Number 15C Only of FEC Form 3**

Page _____ of _____ for
LINE NUMBER 15C _____

(see instructions on back)

Name of Candidate or Committee in Full
JOHN INJI FOR CONGRESS COMMITTEE - AMENDMENT

Total Proceeds during the Reporting Period

1 Sale of tickets (list by event below)*	▶ \$ 12,410.00
2 Misc collections (list by event below)**	▶ \$ _____
3 Sale of items	▶ \$ _____
4 Total (carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3)	▶ \$ 12,410.00

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Misc Collections this Period **
1976 Comprehensive Amendment			
ADDITION - Previously unreported		\$	\$
Caribe Hilton Rally for Jaime Benitez	9-15-76	12,410.00	
Subtotal this period (this page optional)		▶ \$ 12,410.00	\$ _____
Total this period (last page this line number only)		▶ \$ 12,410.00	\$** _____

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Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20543

Itemized Expenditures

**Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3**

(See instructions on back)

Page 1 of 6 for

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Comité Amigos de Jaime Benitez - Amendment

Full Name, mailing address and ZIP code

**Caribprint, Inc.
1409 Las Palmas
Santurce, P. R.**

Purpose of Expenditure

**Invitation for banquet
of Cayey**

Date (month,
day, year)

6-4-76

Amount of each expendi-
ture this period

\$ 80.00

Full Name, mailing address and ZIP code

**Coca Cola Bottling Company
Carr. 3, Km. 2.9, Sábana Llana
Puerto Rico**

Purpose of Expenditure

**Refreshments for
banquet of Cayey**

Date (month,
day, year)

6-4-76

Amount of each expendi-
ture this period

\$ 365.00

Full Name, mailing address and ZIP code

**Ponce Broadcasting Company
Cayey, Puerto Rico**

Purpose of Expenditure

**Radio spots announcing
banquet of Cayey.**

Date (month,
day, year)

6-4-76

Amount of each expendi-
ture this period

\$ 149.00

Full Name, mailing address and ZIP code

**Destilería Serrallés, Inc.
Urbanización Dr. Juliá
Pueblo Viejo, Puerto Rico**

Purpose of Expenditure

**Liquor for banquet
of Cayey**

Date (month,
day, year)

6-4-76

Amount of each expendi-
ture this period

\$ 208.02

Full Name, mailing address and ZIP code

**Club Rotario
Cayey, Puerto Rico**

Purpose of Expenditure

**Rental of Club for
banquet of Cayey**

Date (month,
day, year)

6-17-76

Amount of each expendi-
ture this period

\$ 150.00

Full Name, mailing address and ZIP code

**Luis Romero
Cayey, Puerto Rico**

Purpose of Expenditure

**Payment for bartenders
and waiters for banquet
of Cayey**

Date (month,
day, year)

6-6-76

Amount of each expendi-
ture this period

\$ 210.00

Full Name, mailing address and ZIP code

Petty Cash

Purpose of Expenditure

**Used for miscellaneous
expenses for banquet
of Cayey.**

Date (month,
day, year)

6-17-76

Amount of each expendi-
ture this period

\$ 52.06

Full Name, mailing address and ZIP code

**Monique Lacombe Advertising
1407 Ashford Avenue
Condado, Puerto Rico**

Purpose of Expenditure

**Stationery, logo, and
printing**

Date (month,
day, year)

7-10-76

Amount of each expendi-
ture this period

\$2,086.10

Subtotal of expenditures this page (optional) ▶ **\$3,300.18**

Total this period (last page this line number only) ▶ **\$**

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Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(See instructions on back)

Page 2 of 6 for

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Comité Amigos de Jaime Benítez - Amendment

Full Name, mailing address and ZIP code

**Monique Lacombe Advertising
1407 Ashford Avenue
Condado, Puerto Rico**

Purpose of Expenditure

Invitation for San Juan banquet

Date (month, day, year)

8-30-76

Amount of each expenditure this period

\$ 60.95

Full Name, mailing address and ZIP code

**Monique Lacombe Advertising
1407 Ashford Avenue
Condado, Puerto Rico**

Purpose of Expenditure

Printing of direct mail campaign

Date (month, day, year)

8-30-76

Amount of each expenditure this period

\$ 990.15

Full Name, mailing address and ZIP code

**Monique Lacombe Advertising
1407 Ashford Avenue
Condado, Puerto Rico**

Purpose of Expenditure

Newspaper ads.

Date (month, day, year)

8-30-76

Amount of each expenditure this period

\$ 753.50

Full Name, mailing address and ZIP code

**Monique Lacombe Advertising
1407 Ashford Avenue
Condado, Puerto Rico**

Purpose of Expenditure

Newspaper campaign

Date (month, day, year)

8-30-76

Amount of each expenditure this period

\$ 528.00

Full Name, mailing address and ZIP code

**Carib Print, Inc.
1409 Las Palmas
Santurce, Puerto Rico**

Purpose of Expenditure

Printing

Date (month, day, year)

9-20-76

Amount of each expenditure this period

\$ 850.00

Full Name, mailing address and ZIP code

Full Name, mailing address and ZIP code

Full Name, mailing address and ZIP code

Full Name, mailing address and ZIP code

Purpose of Expenditure

Purpose of Expenditure

Purpose of Expenditure

Date (month, day, year)

Date (month, day, year)

Date (month, day, year)

Amount of each expenditure this period

Amount of each expenditure this period

Amount of each expenditure this period

Subtotal of expenditures this page (optional) ▶ **\$3,182.60**

Total this period (last page this line number only) ▶ **\$**

300103020

Schedule B

July 1976
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20543

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(See instructions on back)

Page 3 of 6 for

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full			
Comité Amigos de Jaime Benítez - Amendment			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	U.S. Postal Service Bulk rate of direct mail campaign	9-20-76	\$ 675.00
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	Bus posters	9-30-76	\$3,000.00
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	Bus posters	10-06-76	\$2,700.00
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	Miscellaneous (long distance phone calls, messengers, etc.)	10-06-76	\$ 165.00
Caribe Hilton P. O. Box 1872 San Juan, P. R.	Rental of banquet facilities, meals, and entertainment for San Juan banquet.	10-15-76	\$8,521.50
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	Bus posters	10-27-76	\$2,822.10
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	Newspaper Ads.	10-27-76	\$ 374.50
Monique Lacombe Advertising 1407 Ashford Avenue	Artwork - Bus Posters	10-27-76	\$ 172.50
Subtotal of expenditures this page (optional)			\$ 18,430.60
Total this period (last page this line number only)			\$

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7000000000

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20542

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 4 of 6 for

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full			
Comité Amigos de Jaime Benitez - Amendment			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	Miscellaneous Advertising	10-27-76	\$ 104.79
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	Advertising	10-27-76	\$ 431.25
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	Advertising	10-27-76	\$ 816.50
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	Newspaper Ad. Production	10-27-76	\$1,050.33
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	TV Program spot Production	10-27-76	\$1,300.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Subtotal of expenditures this page (optional)			\$3,703.37
Total this period (last page this line number only)			\$

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Schedule B

July 1976
Federal Election Commission
1325 M Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 5 of 6 for

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

20010201215
7011000050

Name of Candidate or Committee in full			
Comité Amigos de Jaime Benitez - Amendment			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	TV Ads. - Time	10-27-76	\$1,130.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	TV Program - Time	11-3-76	\$ 700.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	TV Program - Time	11-3-76	\$ 900.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	TV Program - Time	11-3-76	\$ 990.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Subtotal of expenditures this page (optional)			\$ 3,720.00
Total this period (last page this line number only)			\$

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3**

(see instructions on back)

Page 6 of 6 for

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full			
Comité Amigos de Jaime Benítez - Amendment			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	TV Program - Time	11-3-76	\$2,100.00
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	TV Program Announcements	11-8-76	\$ 411.00
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	TV Ads. - Time	11-8-76	\$ 990.00
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	TV Ads. Production	12-1-76	\$ 828.00
Monique Lacombe Advertising 1407 Ashford Avenue Condado, Puerto Rico	TV Ads. Production	12-1-76	\$ 885.53
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Subtotal of expenditures this page (optional)			\$5,214.50
Total this period (last page this line number only)			\$

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FEDERAL ELECTION COMMISSION

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

April 13, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jose E. Alegria
Comite Amigos de Jaime Benitez
75 Condado Avenue
Santurce, Puerto Rico 00907

Re: MUR 505 (78)

Dear Mr. Alegria:

On November 25, 1977, the Federal Election Commission (the Commission) found reasonable cause to believe that the Committee Amigos de Jaime Benitez (the Committee) had violated 2 U.S.C. §434 by failing to file the 1977 required reports.

On January 16, 1978, the Committee was referred to the Office of General Counsel for further review.

On February 1, 1978, the Commission received 1976 and 1977 amended reports that you filed on behalf of the Committee. Although these reports satisfy your reporting requirements for the period of January 1, 1977 through September 30, 1977, they were due as of January 31, 1977, April 10, 1977, and October 10, 1977, respectively. They were not filed until January 31, 1978. Therefore, the Committee was late in fulfilling its reporting obligations and is considered to have been in violation of 2 U.S.C. §434(a)(1).

The Commission is required to endeavor for a period of not less than 30 days to correct such violation and to enter into a conciliation agreement as set forth in 2 U.S.C. §437g(a)(5)(A).

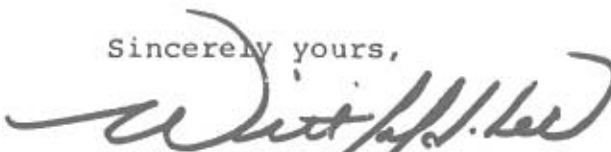
Attached you will find a conciliation agreement this office would propose for the Committee. If you find the proposed conciliation agreement acceptable, please sign on behalf of the Committee, and return to the Commission within 30 days of receipt of this letter. However, we would arrange a meeting to discuss the proposed conciliation agreement if you are not in accord with its substance. Accordingly, we request that you respond within ten (10) days of receipt of this letter so that we may have ample

time to conclude the conciliation period within the required 30 day limit.

Please note that this proposed conciliation agreement refers only to the Committee's reporting obligations. We are aware that the Commission's Audit Division has found various violations within the Committee's records during an extensive audit of the Committee in November, 1977. This may warrant further investigations by the Office of General Counsel at a later date if you do not respond adequately to the requests made by the Audit Division.

If you have any questions, please contact Ellen L. Hughes (telephone no. 202/523-4026), the staff member assigned to this matter.

Sincerely yours,



William C. Oldaker
General Counsel

Enclosure



The image shows a dark, tilted document, likely a form or receipt, with a grid layout. It contains several columns and rows of text, some of which are handwritten. A circular stamp is visible on the left side, containing the date "APR 19 1978". The document is oriented vertically but tilted to the right. The text is mostly illegible due to the low contrast and tilt, but some words like "RECEIVED" and "DELIVERED" are faintly visible. There are also some handwritten numbers and signatures.

BEFORE THE FEDERAL ELECTION COMMISSION

March 30 , 1978

In the Matter of)
Non-Filer/Comite Amigos)
De Jaime Benitez)

MUR 505 (78)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (the Commission) on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation was conducted, and the Commission found reasonable cause to believe that Respondent, Comite Amigos De Jaime Benitez (the Committee), violated 2 U.S.C. §434.

Now therefore, the respective parties herein, the Commission and respondent Committee, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over respondent Committee and the subject matter of this proceeding.

II. That respondent Committee has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. That the pertinent facts of this matter are as follows:

A. Respondent Committee is the principal campaign committee of Jaime Benitez, a candidate for the U.S. House of Representatives

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for Puerto Rico, whose name appeared on the November 2, 1976, general election ballot.

B. Despite having received notices from the Commission informing respondent Committee of its 1977 quarterly reporting obligations, respondent Committee had failed to file timely reports as set forth in 2 U.S.C. §434(a)(1).

C. On February 1, 1978, respondent Committee filed 1976 and 1977 amended reports with the Commission.

Wherefore, respondent Committee agrees:

I. That regardless of respondent Committee's late filing of the 1977 amended report, the Commission construes that respondent Committee was in violation of 2 U.S.C §434.

II. Respondent Committee will pay a civil penalty in the amount of one thousand dollars(\$1,000) pursuant to 2 U.S.C. §437(a)(6)(B).

III. Respondent Committee will continue to file quarterly reports until all debts and obligations are extinguished, together with a statement as to the circumstances and conditions under which any such debt or obligation is extinguished as set forth in 2 U.S.C. §434(b)(12).

GENERAL CONDITIONS

I. The Commission, upon request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue therein, 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.

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II. It is mutually agreed that this agreement shall become effective as to the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that respondent Committee shall have 30 days from the date this agreement becomes effective to comply with and to implement the requirements contained in this agreement and to so notify the Commission.

DATE

FOR THE RESPONDENT
COMITE AMIGOS JAIME DE
BENITEZ

DATE

WILLIAM C. OLDAKER
GENERAL COUNSEL

80010224251

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Non-Filer/Committee
Amigos De Jaime Benitez)

MUR 505 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 12, 1978, the Commission approved by a vote of 5-0 the recommendations of the General Counsel in his report dated March 30, 1978:

1. Approve the conciliation agreement in MUR 505 (78)
2. Send notification letter and conciliation agreement in MUR 505 (78).

Commissioner Thomson was not present at the time of the vote.

Date:

4-12-78

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Report signed by General Counsel: 4-7-78
Received in Commission Secretary's Office: 4-10-78, 11:48
Circulated on 72 hour vote basis: 4-11-78, 12:00

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April 10, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 505

Please have the attached General Counsel's Report on MUR 505 distributed to the Commission on a 72 hour vote (tally sheet) basis.

Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

March 30, 1978

In the Matter of)
)
Non-Filer/Committee) MUR 505 (78)
Amigos De Jaime Benitez)

GENERAL COUNSEL'S REPORT

I. Allegation

The Committee Amigos De Jaime Benitez (the Committee) has failed to file all of the 1977 required reports as set forth in 2 U.S.C. §434(a)(1).

II. Evidence

The following is a list of determinations by the Commission against the Committee in reference to their failure to file the 1977 required reports:

April 10, 1977 Report - Reason to believe letter (RTB) sent on 10/28/77; received on 11/1/77. 1/

Reasonable cause to believe letter (RCTB) sent on 11/25; received on 11/29.

July 10, 1977 Report - RTB sent on 8/9; receipt unaccounted for.

RCTB letter sent on 10/28.

RCTB2 letter sent on 11/25. 2/

1/ Letters and notice receipts are at Attachment A.

2/ RCTB2 refers to a form letter sent which was identical to the RCTB letter except for an additional phrase which stated: "Your continued failure to file this report may result in the Commission initiating a civil suit against you." (see page 2 of 11/25 letter at Attachment A).

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October 10, 1977 Report - RTB letter sent on 10/28.

RCTB letter sent on 11/25. 3/

Mr. Jose Alegria, treasurer of the Committee, had not responded to these letters from the Commission.

III. Further Developments

On February 1, 1978, the Commission received 1976 and 1977 amended reports from the Committee which was a result of a completed audit in November, 1977.

On February 10, 1978, an audit report was referred to the Office of General Counsel concerning the Committee (see Attachment B). The Audit Division recommended that a letter be sent to the treasurer of the Committee to request amendments and additional documentation. If the Committee has not, within 30 days of receipt of this letter, responded adequately to the recommendations, the Office of General Counsel will pursue further investigations of the Committee.

IV. Legal Analysis

The Committee has complied with the reporting obligations as set forth in 2 U.S.C. §434(a)(1). Due to its failure to file timely reports, the Committee is considered to have been in violation of 2 U.S.C. §434(a)(1). Although the Committee may warrant further investigation as a result of the audit completed in November, 1977, it is advisable to allow the Committee 30 days in which to respond adequately to the recommendations made by the audit team.

3/ Please note that the 10/28 and 11/25 letters contain multiple findings.

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V. Recommendation

It is recommended that the Commission approve the conciliation agreement. Send attached notification letter and conciliation agreement.

4/1/78

DATE

William C. Oldaker

WILLIAM C. OLDAKER
GENERAL COUNSEL

80040224256



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

ATTACHMENT A

October 25, 1977

Mr. Jose Alegria -
Comite Amigos de Jaime Benitez
1309 Magdalena Street, Apt. M11
Santurce, Puerto Rico 00907

Dear Mr. Alegria:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act of 1971, as amended. An in-depth review of the reports filed by your committee indicates that you may no longer have a reporting obligation under the Act.

The last report filed with the Commission was marked 10 Day General Report, covering October 1, 1976 through October 18, 1976. If this report was to be considered your Termination Report, please notify the Commission in writing and the appropriate action will be taken to amend the public record. This also applies if you meant to terminate the committee when the candidate filed a Termination Report.

Since the Commission does not have an indication that your committee has terminated, your committee is required to file subsequent reports on its financial activity.

In an election year, a candidate or committee with outstanding debts and obligations shall file a Year End Report, even if contributions or expenditures do not exceed \$1,000. The Commission has not received this report from you.

In any non-election year the candidate and his or her authorized committees shall only be required to file quarterly reports for a calendar quarter in which the candidate and his or her authorized committee received contributions or made expenditures, or both, the total amount of which, taken together, exceeds \$5,000. If this waiver is applicable, the political committee or candidate shall notify the Commission on FEC Form 3a or by letter containing the same information at the close of the first quarter in which the exemption applies. The Commission has not received either a report or a FEC Form 3a from you.

As a result, the Commission has determined the following:



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Your apparent failure to file the Year End Report of Receipts and Expenditures has been noted and the Commission requests that you file your report within ten (10) days.

Your apparent failure to file the April 10 Report of Receipts and Expenditures gives the Commission reason to believe that you are in possible violation of 2 U.S.C. §434.

The Commission has found reason to believe you are in possible violation of 2 U.S.C. §434 for not filing the July 10 Report of Receipts and Expenditures. You were sent a registered notice to that effect. Your failure to respond to that notice gives the Commission reasonable cause to believe you are in possible violation of 2 U.S.C. §434.

Your apparent failure to file the October 10 Report of Receipts and Expenditures gives the Commission reason to believe you are in possible violation of 2 U.S.C. §434.

While the Commission realizes the difficulties you may have experienced in complying with the Act, we must ask that you submit a letter of termination or the above mentioned report(s). You have ten (10) days from receipt of this letter to supply the required information to the appropriate filing office. Copies of the reporting forms (FEC Form 3 and Form 3a) are enclosed for your use.

Should your committee have any questions, or if you need assistance in complying with this request, please contact the Disclosure Division on our Toll Free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas E. Harris

Thomas E. Harris
Chairman

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Enclosures

8004249530



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

November 25, 1977

Mr. Jose Alegria
Committee Amigos de Jaime Benitez
1309 Magdalena Street, Apt. M11
Santurce, Puerto Rico 00907

Dear Mr. Alegria:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act of 1971, as amended. An in-depth review of the reports filed by your committee indicates that you may no longer have a reporting obligation under the Act.

The last report filed with the Commission was marked 10 Day General Report, covering October 1, 1976 through October 18, 1976. If this report was to be considered your Termination Report, please notify the Commission in writing and the appropriate action will be taken to amend the public record. This also applies if you meant to terminate the committee when the candidate filed a Termination Report.

Since the Commission does not have an indication that your committee has terminated, your committee is required to file subsequent reports on its financial activity.

In an election year, a candidate or committee with outstanding debts and obligations shall file a Year End Report, even if contributions or expenditures do not exceed \$1,000. The Commission has not received this report from you.

In any non-election year the candidate and his or her authorized committees shall only be required to file quarterly reports for a calendar quarter in which the candidate and his or her authorized committee received contributions or made expenditures, or both, the total amount of which, taken together, exceeds \$5,000. If this waiver is applicable, the political committee or candidate shall notify the Commission on FEC Form 3a or by letter containing the same information at the close of the first quarter in which the exemption applies. The Commission has not received either a report or a FEC Form 3a from you.

As a result, the Commission has determined the following:

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November 25, 1977

- 2 -

Your apparent failure to file the Year End Report of Receipts and Expenditures has been noted and the Commission requests that you file your report within ten (10) days.

The Commission has found reason to believe you are in possible violation of 2 U.S.C. Section 434 for not filing the April 10 Report of Receipts and Expenditures. You were sent a registered notice to that effect. Your failure to respond to that notice gives the Commission reasonable cause to believe you are in possible violation of 2 U.S.C. Section 434.

The Commission has found reasonable cause to believe that you are in possible violation of 2 U.S.C. §434 for not filing the July 10 Report of Receipts and Expenditures. You were sent a registered notice to that effect. Your continued failure to file this report may result in the Commission initiating a civil suit against you.

The Commission has found reason to believe that you are in possible violation of 2 U.S.C. 434 for not filing the October 10 Report of Receipts and Expenditures. You were sent a registered notice to that effect. Your failure to respond to that notice gives the Commission reasonable cause to believe that you are in possible violation of 2 U.S.C. Section 434.

While the Commission realizes the difficulties you may have experienced in complying with the Act, we must ask that you submit a letter of termination or the above mentioned report(s). You have ten (10) days from receipt of this letter to supply the required information to the appropriate filing office. Copies of the reporting forms (FEC Form 3 and Form 3a) are enclosed for your use.

Should your committee have any questions, or if you need assistance in complying with this request, please contact the Disclosure Division on our Toll Free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas E. Harris

Thomas E. Harris
Chairman

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Enclosures

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COMMITTEE AMIGOS DE JAIME BENITEZ

1ST NOTICE

2ND NOTICE

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4159

PS Form 3811, Mar. 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:
Jose Alegria

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 438363

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 11-1-77

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

NOV 1 1977
 STATION
 CLERK'S INITIALS

☆ GPO : 197-O-234-337

4159/2

PS Form 3811, Mar. 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..... 15¢
 Show to whom, date, & address of delivery.. 35¢
 RESTRICTED DELIVERY Show to whom and date delivered..... 65¢
 RESTRICTED DELIVERY Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Jose E. Alegria

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943221

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 11-29-77

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

NOV 29 1977
 POSTMARK
 LLBI
 G-7
 NON

CLERK'S INITIALS

☆ GPO : 197-O-203-454



FEDERAL ELECTION COMMISSION

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

Re: MUR 505

Hughes

cc: J. Browning

February 10, 1978

MEMORANDUM

TO: WILLIAM C. OLDAKER, GENERAL COUNSEL
THROUGH: ORLANDO B. POTTER, STAFF DIRECTOR *OBP.*
FROM: *RC* ROBERT COSTA/CRAIG RUSSELL *CR*
SUBJECT: AUDIT FINDINGS OF THE COMITE AMIGOS DE JAIME BENITEZ

Attached please find the letter of findings resulting from the audit of the Comite Amigos de Jaime Benitez.

If you concur, we would like to advise the committee of these findings and proceed to obtain from them the amendments and additional documentation requested in the attached letter. Please note that Finding C relates to the acceptance of four (4) apparent corpoptate contributions. However, because of the seriousness of certain of the findings contained herein, together with the significance of the report when taken as a whole, we are forwarding it at this time for your review and consideration as warranting MUR status.

If you have any questions concerning any of the attached findings, please do not hesitate to contact Craig Russell or Tom Haselhorst at extension 3-4155.

Attachment as stated



Audit Findings and Recommendations

A. Recordkeeping for Receipts

Section 432(c)(1) and (2) of Title 2, United States Code, states that the treasurer of a political committee shall keep a detailed and exact account of all contributions made to or for such committee, to include identification of every person making a contribution in excess of \$50 with the date and amount thereof and, if a person's contributions aggregate more than \$100, the account shall include occupation, and the principal place of business (if any).

Section 104.12(b) of Title 11, Code of Federal Regulations, requires in part, that each political committee required to file reports under the Act shall; 1) maintain records with respect to the matters reported, including vouchers, worksheets, receipts, bills and accounts, which shall provide in sufficient detail the necessary information and data from which the filed reports may be verified, and 2) keep those records available for audit or inspection by the Commission or its authorized representatives for a period not less than three (3) years.

During our audit we examined the Committee's receipt records which consisted of listings of the contributors' name, amount and date contributed, covering the period June 8, 1976, the inception date, to October 30, 1976. Receipt records could not be located for the period November 1 - December 31, 1976. A comparison was made between available receipt records and total reportable receipts shown in the bank records from inception through September 30, 1977. Receipts per the Committee's bank records totalled \$37,812.99; however, available contributor records totalled only \$22,677.99 thus leaving a total of \$15,135 of receipts which were undocumented (40.03% of total receipts).

In addition, our review of the Committee's bank records revealed two (2) large cash deposits during the week just prior to the general election, as follows:

<u>DATE PER DEPOSIT-TICKET</u>	<u>CASH</u>	<u>CHECKS</u>	<u>TOTAL DEPOSIT</u>
10/27/76	\$6,380.00	-0-	\$6,380.00
11/3/76*	\$5,110.00	\$1,550.00	\$6,660.00

* Was reflected on the bank statement at October 29, 1976.

The Committee also failed to retain deposit receipts for four (4) deposits (July 28, September 17, October 6 and November 26, 1976), totalling \$17,440.00.

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It is the opinion of the Audit staff that these two (2) large deposits, when added to the bank deposit of \$1,805 on November 26, 1976 (the only bank credit for the period November 1 - December 31, 1976), for a total of \$14,845, represent the bulk of the \$15,135 of receipts for which the Committee apparently maintained no records.

When questioned, the Treasurer was not able to identify the source of the large cash deposits or explain the large overall discrepancy in receipt records. The Treasurer was also unsure whether or not the contributors of these funds were included in the contributor lists reviewed by the Audit staff for the period ending October 30, 1976.

Recommendation

We recommend that the Committee and/or the Candidate make a reasonable effort to identify the sources of the unsupported contributions and furnish copies of documentation obtained, to include the four (4) unavailable deposit receipts, or evidence of their efforts to obtain the documentation, to the Audit staff for review, within 30 days of the Committee's receipt of this letter.

B. Reporting of Receipts

Section 434(b)(2) through (8) of Title 2, United States Code, requires reports filed under the Act to contain certain information with respect to receipts including the total sum of individual contributions not otherwise itemized, the itemization of certain other types of receipts, and the total sum of all receipts made by or for the committee during the reporting period.

During the course of our audit, an examination of the Committee's bank records revealed a total of \$18,088.28 ^{1/} in receipts which the Committee did not report to the Commission. This represents 47.84% of the Committee's total reportable receipts. Because of the recordkeeping problem discussed in Finding A, \$15,135.00 of these unreported receipts remain unidentified. It is the opinion of the Audit staff that, based on our review of the available records, the balance of the unreported receipts (\$2,953.28) ^{1/} is comprised of contributions from individuals.

Our audit also revealed that the Committee reported unnecessarily, and included in its receipt totals, expenditures made on its behalf by the State Popular Democratic Party totalling \$9,953.67.

^{1/} Of this amount, \$500 was itemized by the Committee on Schedule A, but not included in its receipt totals.

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We recommended that the Committee file a comprehensive amendment for 1976 reflecting an increase in Committee receipts for the period of \$8,134.61. On February 1, 1978, we received the Committee's 1976 comprehensive amendment which reflected the correct summary page total for receipts.

Recommendation

We recommend that the Committee file a supplementary amendment itemizing as necessary, those undocumented receipts discussed in Finding A for which records are obtained.

C. Apparent Corporate Contributions

Section 441b(a) of Title 2, United States Code, states in part, that it is unlawful for any corporation to make a contribution to a political committee in connection with any election, or for any candidate, political committee, or other person to knowingly accept any such contribution.

During the course of our audit we determined that the Committee had received four (4) apparent corporate contributions totalling \$310 (see attached list). The corporate status of these business entities was confirmed with the Secretary of State's Office, San Juan, Puerto Rico, during the audit. The Treasurer stated he was unaware the Committee had accepted any corporate contributions, and felt these had been accepted due to clerical oversight.

Recommendation

We recommend that the Committee refund these contributions to the parties involved, and furnish documentary evidence of the refunds to the Audit staff, within 30 days of receipt of this letter.

D. Reporting of Committee Activity Under Candidate's Name

Sections 434(a)(1) and (b) of Title 2, United States Code, require political committees supporting candidate(s), and each candidate for election to Federal office to file with the Commission reports containing information on their receipts, expenditures, and beginning and ending cash.

During the course of our audit it was determined that the Committee's receipt and expenditure activity, except for \$50 in receipts, had been reported to the Commission on reports reflecting only the Candidate's name. In discussions with the Treasurer it was determined that the Candidate raised and spent no funds himself, and that all campaign-related activity occurred through the Committee. Information on Committee receipt and expenditure activity was sent to the Resident Commissioner's office in Washington where the FEC reports were prepared and filed under the Candidate's name.

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We recommended that the Committee and the Candidate submit comprehensive amendments for 1976 transferring all campaign activity from Candidate reports to reports properly reflecting the activity under the name of the Committee. On February 1, 1978, we received comprehensive amendments from the Candidate and the Committee correctly reflecting the transfer of receipt and expenditure activity totals from the Candidate to the Committee.

Recommendation

Because the Committee has satisfactorily complied with our recommendation, no further action on this finding will be recommended.

E. Reporting of Debts and Obligations

Section 434(b)(12) of Title 2, United States Code, states that reports filed by political committees shall disclose the amount and nature of debts and obligations owed by the committee; and requires that these debts and obligations be continuously reported until extinguished, together with a statement of circumstances under which they were extinguished.

Section 104.8(b) of Title 11, Code of Federal Regulations, requires in part, that a debt, obligation, or other promise to pay in excess of \$500 be reported as of the time of the transaction.

Our examination of Committee records revealed an obligation to the Committee's media firm which attained reportable status as of July 31, 1976, and which required continuous reporting through the year-end 1976 report, at which time the balance owed by the Committee was \$7,943.83. Since that time, the Committee has made no additional payments toward retiring this obligation. At no time during this period did the Committee or the Candidate disclose this obligation in its reports to the Commission. The Treasurer indicated this omission was due to a misunderstanding of the reporting requirements for obligations.

On February 1, 1978, the Committee filed a report (as of September 30, 1977) disclosing the obligation on the required Schedule C.

Recommendation

We further recommend that the Committee, within 30 days of receipt of this letter, file a comprehensive amendment for 1976 to include the appropriate Schedule C, disclosing the total obligation, payments to date, and balance outstanding on the above-mentioned obligation. Furthermore, the Committee is advised that it must continue to file reports until the debt is extinguished (in accordance with Section 434(b)(12) of Title 2 of the United States Code), and that any settlement of the obligation with the vendor at less than the value of the services is subject to Commission review, (per 11CFR 114.10(c)(3)).

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F. Itemization of Contributions

Section 434(b)(2) of Title 2, United States Code, requires a committee to include in its reports the full name and address, occupation and principal place of business of each person making a contribution(s) in excess or aggregating in excess of \$100 within a calendar year, together with the amount and date of such contribution(s).

Our review of the Committee's available receipt records revealed nine (9) contributions from as many contributors in excess of \$100 or aggregating in excess of \$100, which were not itemized by the Committee as required in its reports to the Commission. These contributions ranged in amount from \$50 to \$500 and totalled \$1,400. The Treasurer attributed these omissions to clerical oversight in the preparation of the reports.

In addition, of the 31 contributions itemized on the Candidate's reports:

- a) 3 contributions (9.67%) failed to reflect an address
- b) 11 contributions (35.48%) failed to reflect the individual's occupation
- c) 19 contributions (61.29%) failed to reflect the individual's principal place of business

We recommended that the Committee file a comprehensive amendment for 1976 itemizing the previously omitted contributions, and reflecting the missing address, occupation, and principal place of business information for those itemized contributions noted above. On February 1, 1978, we received the Committee's comprehensive amendment which materially complied with our recommendation.

Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

G. Reporting and Itemization of Expenditures

Section 434(b)(9) and (11) of Title 2, United States Code, requires that a committee disclose in its reports to the Commission the identification of each person to whom expenditures have been made by such committee within the calendar year in an aggregate amount in excess of \$100, the amount, date and purpose of each such expenditure; and, the total sum of expenditures made by such committee during the calendar year.

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During the course of the audit, our examination of the Committee's expenditures revealed 12 expenditures in excess of \$100 which the Committee neither itemized as required, nor included in its total expenditure figures as reported to the Commission. These 12 expenditures (36.36% of the total number of itemizable expenditures), ranged in amount from \$411 to \$3,000 and totalled \$13,146, or 35.13% of total itemizable expenditures. The Treasurer attributed these reporting omissions to a lack of co-ordination between the campaign office in San Juan and the Resident Commissioner's office in Washington where the FEC reports were prepared.

We recommended that the Committee file a 1976 comprehensive amendment itemizing these previously omitted expenditures, and adjusting its year-to-date totals accordingly. On February 1, 1978, the Committee filed its comprehensive amendment for 1976 including the expenditures noted above.

Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

H. Disclosure of Committee Depository

Section 433(b)(9) of Title 2, United States Code, requires that a committee reveal in its statement of organization a listing of all banks, safety deposit boxes, or other repositories used by the committee.

Our review of the Committee's bank records revealed the use of a depository which was not reported as required by the Committee on its Statement of Organization, in any amendments submitted thereto, nor on the Statement of Candidate. Furthermore, the depository disclosed by the Committee in its Statement of Organization was never used by the Committee during the period under audit.

Recommendation

We recommend that the Committee file an amended Statement of Organization disclosing the Committee's true depository within 30 days of receipt of this letter. We also recommend that the Candidate file an amended Statement of Candidacy designating the account as the Committee depository.

I. Disclosure of Fundraising Activity

Section 434(b)(6)(A) and (B) of Title 2, United States Code, requires that reports filed by committees under the Act shall disclose the total amount of proceeds from the sale of tickets to each dinner, rally, and other fundraising event, and mass collections made at such events.

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During the course of our audit, it was determined that a major fundraising banquet was held by the Committee in September 1976, at the Caribe Hilton, San Juan, which was not disclosed by the Committee on the required Schedule D. The Treasurer stated that a deposit made to the Committee's account on September 17, 1976, for \$12,410 represented the bulk of proceeds collected from the dinner.

We recommended that the Committee file its 1976 comprehensive amendment to include the appropriate Schedule D disclosing the total of proceeds from the fundraising activity referred to above. On February 1, 1978, the Committee filed its 1976 comprehensive amendment disclosing the fundraiser as recommended.

Recommendation

Because the Committee has complied in this matter, no further action will be recommended.

J. Filing of Reports in Non-Election Year

Sections 104.1(a), (c)(2) and (c)(3)(i) of Title 11, Code of Federal Regulations, require each political committee to file quarterly reports of contributions and expenditures (unless waived) until all debts and obligations relating to that committee's Federal election activity are extinguished, and the committee has filed a valid Notice of Termination. In any non-election year such committee shall only be required to file quarterly reports for a calendar quarter during which contributions received or expenditures made, when added together, exceed \$5,000. If the level of activity does not exceed \$5,000 per calendar quarter, the political committee shall notify the Commission on FEC Form 3a or by letter containing the same information at the close of the first quarter in which the exemption applies.

Our review of the Committee's reports filed with the Commission revealed no FEC Form 3a or letter equivalent filed by the Committee for the first quarter 1977. Bank records for the period indicated \$9.00 of expenditure activity and no receipt activity.

Recommendation

We recommend that the Committee file the omitted FEC Form 3a for the first quarter of 1977 within 30 days of receipt of this letter.

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K. Other Matters

Noted below is a matter for which the Audit staff feels no further action is required by the Committee:

Our examination of the Committee's solicitation literature, consisting of a mass mailing letter and a newspaper ad solicitation, revealed that neither contained the required notification as per Section 435(b) of Title 2 of the United States Code. The Committee was advised of the required notification for all solicitation literature in accordance with this section of the Act.

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ATTACHMENT 1

COMITE AMIGOS DE JAIME BENITEZ
SCHEDULE OF APPARENT CORPORATE CONTRIBUTIONS

<u>CONTRIBUTOR</u>	<u>DATE</u>	<u>AMOUNT</u>	<u>DATE OF INCORPORATION</u>
1) Lube Construction Corp. Hato Rey, P.R.	6/76	\$ 40.00	1/16/69
2) Esteban Huertas, Inc. Box 792 Caguas, P.R.	6/76	20.00	3/2/73
3) Robert F. McCloskey Associates, Inc.	9/20/76	200.00	8/9/73
4) Underwear Corp. GPO Box 2947 San Juan, P.R. 00936 (listed under "Grana Corp." in Secretary of State's records)	8/26/76	50.00	11/17/64
	TOTAL	\$310.00	

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jose E. Alegria
Comite Amigos de Jaime Benitez
75 Condado Avenue
Santurce, Puerto Rico 00907

Re: MUR 505 (78)

Dear Mr. Alegria:

On November 25, 1977, the Federal Election Commission (the Commission) found reasonable cause to believe that the Committee Amigos de Jaime Benitez (the Committee) had violated 2 U.S.C. §434 by failing to file the 1977 required reports.

On January 16, 1978, the Committee was referred to the Office of General Counsel for further review.

On February 1, 1978, the Commission received 1976 and 1977 amended reports that you filed on behalf of the Committee. Although these reports satisfy your reporting requirements for the period of January 1, 1977 through September 30, 1977, the were due as of January 31, 1977, April 10, 1977, and October 10, 1977, respectively. They were not filed until January 31, 1978. Therefore, the Committee was late in fulfilling its reporting obligations and is considered to have been in violation of 2 U.S.C. §434(a)(1).

The Commission is required to endeavor for a period of not less than 30 days to correct such violation and to enter into a conciliation agreement as set forth in 2 U.S.C. §437g(a)(5)(A).

Attached you will find a conciliation agreement this office would propose for the Committee. If you find the proposed conciliation agreement acceptable, please sign on behalf of the Committee, and return to the Commission within 30 days of receipt of this letter. However, we would arrange a meeting to discuss the proposed conciliation agreement if you are not in accord with its substance. Accordingly, we request that you respond within ten (10) days of receipt of this letter so that we may have ample

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time to conclude the conciliation period within the required 30 day limit.

Please note that this proposed conciliation agreement refers only to the Committee's reporting obligations. We are aware that the Commission's Audit Division has found various violations within the Committee's records during an extensive audit of the Committee in November, 1977. This may warrant further investigations by the Office of General Counsel at a later date if you do not respond adequately to the requests made by the Audit Division.

If you have any questions, please contact Ellen L. Hughes (telephone no. 202/523-4026), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

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BEFORE THE FEDERAL ELECTION COMMISSION

March , 1978

In the Matter of)
Non-Filer/Comite Amigos) MUR 505 (78)
De Jaime Benitez)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (the Commission) on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation was conducted, and the Commission found reasonable cause to believe that Respondent, Comite Amigos De Jaime Benitez (the Committee), violated 2 U.S.C. §434.

Now therefore, the respective parties herein, the Commission and respondent Committee, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over respondent Committee and the subject matter of this proceeding.

II.. That respondent Committee has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. That the pertinent facts of this matter are as follows:

A. Respondent Committee is the principal campaign committee of Jaime Benitez, a candidate for the U.S. House of Representatives

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for Puerto Rico, whose name appeared on the November 2, 1976, general election ballot.

B. Despite having received notices from the Commission informing respondent Committee of its 1977 quarterly reporting obligations, respondent Committee had failed to file timely reports as set forth in 2 U.S.C. §434(a)(1).

C. On February 1, 1978, respondent Committee filed 1976 and 1977 amended reports with the Commission.

Wherefore, respondent Committee agrees:

I. That regardless of respondent Committee's late filing of the 1977 amended report, the Commission construes that respondent Committee was in violation of 2 U.S.C §434.

II. Respondent Committee will pay a civil penalty in the amount of one thousand dollars(\$1,000) pursuant to 2 U.S.C. §437(a)(6)(B).

III. Respondent Committee will continue to file quarterly reports until all debts and obligations are extinguished, together with a statement as to the circumstances and conditions under which any such debt or obligation is extinguished as set forth in 2 U.S.C. §434(b)(12).

GENERAL CONDITIONS

I. The Commission, upon request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue therein, 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.

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II. It is mutually agreed that this agreement shall become effective as to the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that respondent Committee shall have 30 days from the date this agreement becomes effective to comply with and to implement the requirements contained in this agreement and to so notify the Commission.

DATE

FOR THE RESPONDENT
COMITE AMIGOS JAIME DE
BENITEZ

DATE

WILLIAM C. OLDAKER
GENERAL COUNSEL

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80010224277

Re: MUR 505



FEDERAL ELECTION COMMISSION

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

February 10, 1978

MEMORANDUM

TO: WILLIAM C. OLDAKER, GENERAL COUNSEL

THROUGH: ORLANDO B. POTTER, STAFF DIRECTOR *OBP*

FROM: *RC* ROBERT COSTA/CRAIG RUSSELL *CR*

SUBJECT: AUDIT FINDINGS OF THE COMITE AMIGOS DE JAIME BENITEZ

Attached please find the letter of findings resulting from the audit of the Comite Amigos de Jaime Benitez.

If you concur, we would like to advise the committee of these findings and proceed to obtain from them the amendments and additional documentation requested in the attached letter. Please note that Finding C relates to the acceptance of four (4) apparent corpoptate contributions. However, because of the seriousness of certain of the findings contained herein, together with the significance of the report when taken as a whole, we are forwarding it at this time for your review and consideration as warranting MUR status.

If you have any questions concerning any of the attached findings, please do not hesitate to contact Craig Russell or Tom Haselhorst at extension 3-4155.

Attachment as stated



Audit Findings and Recommendations

A. Recordkeeping for Receipts

Section 432(c)(1) and (2) of Title 2, United States Code, states that the treasurer of a political committee shall keep a detailed and exact account of all contributions made to or for such committee, to include identification of every person making a contribution in excess of \$50 with the date and amount thereof and, if a person's contributions aggregate more than \$100, the account shall include occupation, and the principal place of business (if any).

Section 104.12(b) of Title 11, Code of Federal Regulations, requires in part, that each political committee required to file reports under the Act shall; 1) maintain records with respect to the matters reported, including vouchers, worksheets, receipts, bills and accounts, which shall provide in sufficient detail the necessary information and data from which the filed reports may be verified, and 2) keep those records available for audit or inspection by the Commission or its authorized representatives for a period not less than three (3) years.

During our audit we examined the Committee's receipt records which consisted of listings of the contributors' name, amount and date contributed, covering the period June 8, 1976, the inception date, to October 30, 1976. Receipt records could not be located for the period November 1 - December 31, 1976. A comparison was made between available receipt records and total reportable receipts shown in the bank records from inception through September 30, 1977. Receipts per the Committee's bank records totalled \$37,812.99; however, available contributor records totalled only \$22,677.99 thus leaving a total of \$15,135 of receipts which were undocumented (40.03% of total receipts).

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* Was reflected on the bank statement at October 29, 1976.

The Committee also failed to retain deposit receipts for four (4) deposits (July 28, September 17, October 6 and November 26, 1976), totalling \$17,440.00.

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It is the opinion of the Audit staff that these two (2) large deposits, when added to the bank deposit of \$1,805 on November 26, 1976 (the only bank credit for the period November 1 - December 31, 1976), for a total of \$14,845, represent the bulk of the \$15,135 of receipts for which the Committee apparently maintained no records.

When questioned, the Treasurer was not able to identify the source of the large cash deposits or explain the large overall discrepancy in receipt records. The Treasurer was also unsure whether or not the contributors of these funds were included in the contributor lists reviewed by the Audit staff for the period ending October 30, 1976.

Recommendation

We recommend that the Committee and/or the Candidate make a reasonable effort to identify the sources of the unsupported contributions and furnish copies of documentation obtained, to include the four (4) unavailable deposit receipts, or evidence of their efforts to obtain the documentation, to the Audit staff for review, within 30 days of the Committee's receipt of this letter.

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Section 434(b)(2) through (8) of Title 2, United States Code, requires reports filed under the Act to contain certain information with respect to receipts including the total sum of individual contributions not otherwise itemized, the itemization of certain other types of receipts, and the total sum of all receipts made by or for the committee during the reporting period.

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Our audit also revealed that the Committee reported unnecessarily, and included in its receipt totals, expenditures made on its behalf by the State Popular Democratic Party totalling \$9,953.67.

^{1/} Of this amount, \$500 was itemized by the Committee on Schedule A, but not included in its receipt totals.

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We recommended that the Committee file a comprehensive amendment for 1976 reflecting an increase in Committee receipts for the period of \$8,134.61. On February 1, 1978, we received the Committee's 1976 comprehensive amendment which reflected the correct summary page total for receipts.

Recommendation

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C. Apparent Corporate Contributions

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Recommendation

We recommend that the Committee refund these contributions to the parties involved, and furnish documentary evidence of the refunds to the Audit staff, within 30 days of receipt of this letter.

D. Reporting of Committee Activity Under Candidate's Name

Sections 434(a)(1) and (b) of Title 2, United States Code, require political committees supporting candidate(s), and each candidate for election to Federal office to file with the Commission reports containing information on their receipts, expenditures, and beginning and ending cash.

During the course of our audit it was determined that the Committee's receipt and expenditure activity, except for \$50 in receipts, had been reported to the Commission on reports reflecting only the Candidate's name. In discussions with the Treasurer it was determined that the Candidate raised and spent no funds himself, and that all campaign-related activity occurred through the Committee. Information on Committee receipt and expenditure activity was sent to the Resident Commissioner's office in Washington where the FEC reports were prepared and filed under the Candidate's name.

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We recommended that the Committee and the Candidate submit comprehensive amendments for 1976 transferring all campaign activity from Candidate reports to reports properly reflecting the activity under the name of the Committee. On February 1, 1978, we received comprehensive amendments from the Candidate and the Committee correctly reflecting the transfer of receipt and expenditure activity totals from the Candidate to the Committee.

Recommendation

Because the Committee has satisfactorily complied with our recommendation, no further action on this finding will be recommended.

E. Reporting of Debts and Obligations

Section 434(b)(12) of Title 2, United States Code, states that reports filed by political committees shall disclose the amount and nature of debts and obligations owed by the committee; and requires that these debts and obligations be continuously reported until extinguished, together with a statement of circumstances under which they were extinguished.

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On February 1, 1978, the Committee filed a report (as of September 30, 1977) disclosing the obligation on the required Schedule C.

Recommendation

We further recommend that the Committee, within 30 days of receipt of this letter, file a comprehensive amendment for 1976 to include the appropriate Schedule C, disclosing the total obligation, payments to date, and balance outstanding on the above-mentioned obligation. Furthermore, the Committee is advised that it must continue to file reports until the debt is extinguished (in accordance with Section 434(b)(12) of Title 2 of the United States Code), and that any settlement of the obligation with the vendor at less than the value of the services is subject to Commission review, (per 11CFR 114.10(c)(3)).

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In addition, of the 31 contributions itemized on the Candidate's reports:

- a) 3 contributions (9.67%) failed to reflect an address
- b) 11 contributions (35.48%) failed to reflect the individual's occupation
- c) 19 contributions (61.29%) failed to reflect the individual's principal place of business

We recommended that the Committee file a comprehensive amendment for 1976 itemizing the previously omitted contributions, and reflecting the missing address, occupation, and principal place of business information for those itemized contributions noted above. On February 1, 1978, we received the Committee's comprehensive amendment which materially complied with our recommendation.

Recommendation

Because the Committee has satisfactorily complied in this matter, no further action will be recommended.

G. Reporting and Itemization of Expenditures

Section 434(b)(9) and (11) of Title 2, United States Code, requires that a committee disclose in its reports to the Commission the identification of each person to whom expenditures have been made by such committee within the calendar year in an aggregate amount in excess of \$100, the amount, date and purpose of each such expenditure; and, the total sum of expenditures made by such committee during the calendar year.

80010324293

During the course of the audit, our examination of the Committee's expenditures revealed 12 expenditures in excess of \$100 which the Committee neither itemized as required, nor included in its total expenditure figures as reported to the Commission. These 12 expenditures (36.36% of the total number of itemizable expenditures), ranged in amount from \$411 to \$3,000 and totalled \$13,146, or 35.13% of total itemizable expenditures. The Treasurer attributed these reporting omissions to a lack of co-ordination between the campaign office in San Juan and the Resident Commissioner's office in Washington where the FEC reports were prepared.

We recommended that the Committee file a 1976 comprehensive amendment itemizing these previously omitted expenditures, and adjusting its year-to-date totals accordingly. On February 1, 1978, the Committee filed its comprehensive amendment for 1976 including the expenditures noted above.

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H. Disclosure of Committee Depository

Section 433(b)(9) of Title 2, United States Code, requires that a committee reveal in its statement of organization a listing of all banks, safety deposit boxes, or other repositories used by the committee.

Our review of the Committee's bank records revealed the use of a depository which was not reported as required by the Committee on its Statement of Organization, in any amendments submitted thereto, nor on the Statement of Candidate. Furthermore, the depository disclosed by the Committee in its Statement of Organization was never used by the Committee during the period under audit.

Recommendation

We recommend that the Committee file an amended Statement of Organization disclosing the Committee's true depository within 30 days of receipt of this letter. We also recommend that the Candidate file an amended Statement of Candidacy designating the account as the Committee depository.

I. Disclosure of Fundraising Activity

Section 434(b)(6)(A) and (B) of Title 2, United States Code, requires that reports filed by committees under the Act shall disclose the total amount of proceeds from the sale of tickets to each dinner, rally, and other fundraising event, and mass collections made at such events.

80010224291

During the course of our audit, it was determined that a major fundraising banquet was held by the Committee in September 1976, at the Caribe Hilton, San Juan, which was not disclosed by the Committee on the required Schedule D. The Treasurer stated that a deposit made to the Committee's account on September 17, 1976, for \$12,410 represented the bulk of proceeds collected from the dinner.

We recommended that the Committee file its 1976 comprehensive amendment to include the appropriate Schedule D disclosing the total of proceeds from the fundraising activity referred to above. On February 1, 1978, the Committee filed its 1976 comprehensive amendment disclosing the fundraiser as recommended.

Recommendation

Because the Committee has complied in this matter, no further action will be recommended.

J. Filing of Reports in Non-Election Year

Sections 104.1(a), (c)(2) and (c)(3)(i) of Title 11, Code of Federal Regulations, require each political committee to file quarterly reports of contributions and expenditures (unless waived) until all debts and obligations relating to that committee's Federal election activity are extinguished, and the committee has filed a valid Notice of Termination. In any non-election year such committee shall only be required to file quarterly reports for a calendar quarter during which contributions received or expenditures made, when added together, exceed \$5,000. If the level of activity does not exceed \$5,000 per calendar quarter, the political committee shall notify the Commission on FEC Form 3a or by letter containing the same information at the close of the first quarter in which the exemption applies.

Our review of the Committee's reports filed with the Commission revealed no FEC Form 3a or letter equivalent filed by the Committee for the first quarter 1977. Bank records for the period indicated \$9.00 of expenditure activity and no receipt activity.

Recommendation

We recommend that the Committee file the omitted FEC Form 3a for the first quarter of 1977 within 30 days of receipt of this letter.

80010321395

K. Other Matters

Noted below is a matter for which the Audit staff feels no further action is required by the Committee:

Our examination of the Committee's solicitation literature, consisting of a mass mailing letter and a newspaper ad solicitation, revealed that neither contained the required notification as per Section 435(b) of Title 2 of the United States Code. The Committee was advised of the required notification for all solicitation literature in accordance with this section of the Act.

80010221296

ATTACHMENT I

COMITE AMIGOS DE JAIME BENITEZ
SCHEDULE OF APPARENT CORPORATE CONTRIBUTIONS

<u>CONTRIBUTOR</u>	<u>DATE</u>	<u>AMOUNT</u>	<u>DATE OF INCORPORATION</u>
1) Lube Construction Corp. Hato Rey, P.R.	6/76	\$ 40.00	1/16/69
2) Esteban Huertas, Inc. Box 792 Caguas, P.R.	6/76	20.00	3/2/73
3) Robert F. McCloskey Associates, Inc.	9/20/76	200.00	8/9/73
4) Underwear Corp. GPO Box 2947 San Juan, P.R. 00936 (listed under "Grana Corp." in Secretary of State's records)	8/26/76	50.00	11/17/64
	TOTAL	\$310.00	

80010221297



FEDERAL ELECTION COMMISSION

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

January 16, 1978

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER *OBP*

FROM: LOIS ZELLA *L. Zella*

SUBJECT: NON-FILERS

The Reports Analysis Division has completed, (through publication), its tracking of candidates/committees that are non-filers for several reporting periods ("multiple non-filers"). Attached is a chart of these multiple non-filers which shows the various actions the Commission has approved and the date of such actions. The green certification cards for each stage are also attached.

On January 9, 1978, the Press Office issued a release containing the names of those candidates/committees that failed to file various reports. (see chart attached) Only those candidates/committees whom the Commission had sent reason to believe and reasonable cause to believe notices were published in the press release.

Also included in this referral are committees which have failed to file the 1976 Year End Report. These committees have been notified twice concerning their year-end reporting obligation. However, the Commission has not made a finding of reason to believe or reasonable cause to believe for their failure to file the Year End Report.

Should you have any questions, or need any assistance, please let me know. As our Division becomes aware of any of these candidates/committees filing any of their outstanding reports, we will contact your office immediately. Should your office receive any reports that would take a candidate/committee off this list I would appreciate being informed of this immediately. Recommendations for three (3) committees have been included for your reference. Should your office concur with these recommendations, I would appreciate being so informed.

80040221298



COMMITTEE NAME

LAST REPORT FILED

JANUARY 31 REPORT

APRIL 10 REPORT

JULY 10 REPORT

OCTOBER 10 REPORT

REGARDS TO THE LINDSAY
YEARS COMMITTEE(1972) 1/

COLLEGE STUDENTS FOR
REAGAN(IND. EXP. COMM.)

CITIZENS FOR RESPONSIBLE
ACTION (IND. EXP. COM.)

COMMITTEE NAME	LAST REPORT FILED			JANUARY 31 REPORT				APRIL 10 REPORT				JULY 10 REPORT			OCTOBER 10 REPORT						
	RCPTS	EXP.	C. Deb	Not. 1	Not. 2	RTR	RCTR	RCTR2	FILED	RTR	RCTR	RCTR2	RCTR3	FILED	RTR	RCTR	RCTR2	FILED	RTR	RCTR	FILED
REGARDS TO THE LINDSAY YEARS COMMITTEE(1972) 1/				(*) N/A	N/A	4/1	4/27	10/28 11/25		5/7	5/27	10/28	11/25		8/9	10/28	11/25		10/28	11/25	
COLLEGE STUDENTS FOR REAGAN(IND. EXP. COMM.)	5025	2718	307188	N/A	N/A	4/1	4/27	10/28 11/25		10/28	11/25				10/28	11/25			10/28	11/25	
CITIZENS FOR RESPONSIBLE ACTION (IND. EXP. COM.)	4,350	3628	6211000			4/1	4/27	10/28 11/25		10/28	11/25				10/28	11/25			10/28	11/25	

(*) \$233,569

1/ THIS COMMITTEE HAS BEEN UNABLE TO FILE REPORTS BECAUSE ITS RECORDS ARE IN THE POSSESSION OF THE NEW YORK STATE ATTORNEY GENERAL'S OFFICE.

C = Cash on Hand

8 0 7 4 0 0 4 9 0

COMMITTEE NAME

LAST REPORT FILED

JANUARY 31 REPORT

APRIL 10 REPORT

JULY 10 REPORT

OCTOBER 10 REPORT

SENATE

BECAN FOR SENATE

GIFFORD FOR U.S. SENATE

TIERNEY FOR U.S. SENATE COMM.

CANDIDATE NAME

BECAN, DAN

GIFFORD, HOWARD

Thurman Hamlin
Trenton H. Parker Senate
Campaign Comm. Inc.

COMMITTEE NAME	LAST REPORT FILED		JANUARY 31 REPORT				APRIL 10 REPORT				JULY 10 REPORT			OCTOBER 10 REPORT							
	RCPTS	EXP. C.	Deb	Not. 1	Not. 2	RTB	RCTR	RCTR3	FILED	RTB	RCTR	RCTR2	RCTR3	FILED	RTB	RCTR	RCTR2	FILED	RTB	RCTR	FILED
BECAN FOR SENATE	1,040	2,753	0	333	N/A	N/A	4/1	4/29	10/28 11/25		5/7	5/27	10/28	11/25		8/9	10/28	11/25		10/28	11/25
GIFFORD FOR U.S. SENATE	1,700	1,000	700	-	10/28	10/28					5/7	5/27	10/28	11/25		8/9	10/28	11/25		10/28	11/25
TIERNEY FOR U.S. SENATE COMM.	13545	13545	0	752	N/A	N/A	4/1	4/29	10/28 11/25		5/7	5/27	10/28	11/25		8/9	10/28	11/25		10/28	11/25
BECAN, DAN	4,049	2808	0	357	10/28	11/25					5/7	5/27	10/28	11/25		8/9	10/28	11/25		10/28	11/25
GIFFORD, HOWARD	1434	3552	0	239	10/28	11/25					5/7	5/27	10/28	11/25		8/9	10/28	11/25		10/28	11/25
Thurman Hamlin Trenton H. Parker Senate Campaign Comm. Inc.	ONLY DOCUMENT	FILED IS	FORM	2 ON	4/17/77															10/31	11/21
	20	1000	0	-					yes					yes				yes		10/31	11/21

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 JANUARY 31 REPORT APRIL 10 REPORT

COMMITTEE NAME

LAST REPORT FILED

JULY 10 REPORT

OCTOBER 10 REPORT

COMMITTEE NAME	JANUARY 31 REPORT				APRIL 10 REPORT				JULY 10 REPORT				OCTOBER 10 REPORT			
	RCPTS	EXP.	C.	Deb	Not. 1	Not. 2	RTB	RCTB	RCTB2	FILED	RTB	RCTB	RCTB2	FILED	RTB	FILED
BILL BROWN FOR CONGRESS CAMPAIGN COMMITTEE	13881	13898	0	144	10/28	11/25					yes	8/9	10/28	11/25	10/28	11/25
BOUEY FOR CONGRESS	91	812	8	314	10/28	11/25				5/7	5/27	10/28	11/25	8/9	10/28	11/25
CITIZENS FOR DENNERLL COM.	1182	1182	0	983	10/28	11/25				5/7	10/28	11/25		8/9	10/28	11/25
CITIZENS FOR GRIMM	350	259	90	0	10/28	11/25				5/7	5/27	10/28	11/25	8/9	10/28	11/25
CITIZENS TO ELECT CAMPENNI	11515	11515	0	1197	10/28	11/25				5/7	5/27	10/28	11/25	8/9	10/28	11/25
CLARK FOR CONGRESS	61285	61214	71	237	10/28	11/25					3a			3a		n/a
COMMITTEE AMIGOS DE JAIME BENITEZ**	29,679	2405	273		10/28	11/25				10/28	11/25			8/9	10/28	11/25
COMMITTEE TO ELECT BRUCE LATTI	7002 6703	7002 6306	--	Candidate	10/28	11/25				5/7	5/27	10/28	11/25	8/9	10/28	11/25
COMMITTEE TO ELECT CHARLES G. JOHNS	0	32	0	0	10/28	11/25				5/7	5/27	10/28	11/25	8/9	10/28	11/25
COMMITTEE TO ELECT HARRY A. HANNA	8845	7189	165	251	10/28	11/25				5/7	5/27	10/28	11/25	8/9	10/28	11/25
COMMITTEE TO ELECT HILL TO CONGRESS	1200	1200	0	0	10/28	11/25				5/7	5/27	10/28	11/25	8/9	10/28	11/25
COMMITTEE TO ELECT KARL T. UNTCH	5	4	.81	0	10/28	11/25				5/7	5/27	10/28	11/25	8/9	10/28	11/25
COMMITTEE TO ELECT ROBERT M. REYNOLDS	914	819	94	38.75	10/28	11/25				5/7	5/27	10/28	11/25	8/9	10/28	11/25
COMMITTEE TO ELECT ROBERT SIEBURG '76	1004	2324	0	1820	10/28	11/25				5/7	5/27	10/28	11/25	10/28	11/25	

** CANDIDATE AND COMMITTEE MIX

COMMITTEE NAME

LAST REPORT FILED

JANUARY 31 REPORT

APRIL 10 REPORT

JULY 10 REPORT

OCTOBER 10 REPORT

DAN FINNIGAN FOR CONGRESS

FRANKE FOR CONGRESS

JESSE RATTLEY FOR CONGRESS

JIM HOWARD FOR CONGRESS COM.

SCHADE FOR CONGRESS

SPIRIT OF 76 CAMPAIGN

STOUT FOR CONGRESS

THI 1 CITIZENS FOR

REYNOLDS, ROBERT

Allen Blume for Cong. Comm.

John Hemerway for Cong. Comm.

COMMITTEE NAME	JANUARY 31 REPORT					APRIL 10 REPORT					JULY 10 REPORT			OCTOBER 10 REPORT						
	RCPTS	EXP	C	Db	Not. 1	Not. 2	RTR	RCTB	RCTB2	FILED	RTR	RCTB	RCTB2	FILED	RTR	RCTB	FILED			
DAN FINNIGAN FOR CONGRESS	5580	5170	47	23600	10/28	11/25								3a			N/A	N/A		
FRANKE FOR CONGRESS	1680	2102	17	600	10/28	11/25					5/7	5/27	10/28	11/25	8/9	10/28	11/25	10/28	11/25	
JESSE RATTLEY FOR CONGRESS	14876	1155	158	4000	10/28	11/25								3a			N/A	N/A		
JIM HOWARD FOR CONGRESS COM.	14820	14657	16	2750			YES				5/7 (ret)	5/27 (ret)	10/28	11/25			3a		N/A	
SCHADE FOR CONGRESS	10804	10801	-2	2295	10/28	11/25					5/7	5/27	10/28	11/25	8/9	10/28	11/25	10/28	11/25	
SPIRIT OF 76 CAMPAIGN	2000	2000	0	0	10/28	11/25					10/28	11/25			8/9	10/28	11/25	10/28	11/25	
STOUT FOR CONGRESS	6461	6432	28	1010	10/28	11/25					5/7 (RET)	5/27 (RET)	10/28	11/25	8/9	10/28	11/25	10/28	11/25	
THI 1 CITIZENS FOR	1445	1347	67	0	10/28	11/25					5/7 (RET)	5/27 (RET)	10/28	11/25	8/9	10/28	11/25	10/28	11/25	
REYNOLDS, ROBERT	300	300	0	3835			YES				10/28	11/25			8/9	10/28	11/25	10/28	11/25	
Allen Blume for Cong. Comm.	900	1450	44	2515			yes											yes	10/31	11/21
John Hemerway for Cong. Comm.				2035			yes											yes	10/31	11/21

-4-

RET = Notification
Returned

COMMITTEE NAME

LAST REPORT FILED

9 0 3 1 0 ? ? 1 ? ? 3
JANUARY 31 REPORT APRIL 10 REPORT

JULY 10 REPORT

OCTOBER 10 REPORT

COMMITTEE NAME	JANUARY 31 REPORT			APRIL 10 REPORT					JULY 10 REPORT			OCTOBER 10 REPORT									
	RCPTS	EXP.	C. Dbl	Not. 1	Not. 2	RTB	RCIB	RCIB2	FILED	RTB	RCIB	RCIB2	RCIB3	FILED	RTB	RCIB	RCIB2	FILED	RTB	RCIB	FILED
NON-PARTY																					
SPORTSMEN FOR KENTUCKY	3065	15140	1117	0			4/1	10/28	11/25					12/6				3a			N/A
TAXPAYERS ACTION FUND	16022	86640	816	4701			4/1	10/28	11/25	5/7	5/27	10/28	11/25	8/9	10/28	11/25			10/28	11/25	
UNITED NATIONS REFORM ELECTORAL CAMPAIGN COM.	1230	2412	311	0			4/1	10/28	11/25					3a				3a			N/A
PARTY																					
DEMOCRATS ABROAD (FRANCE)	4018	2650	1367	0	10/28	11/25								3a				3a			N/A
GENESEE COUNTY REPUBLICAN FINANCE COMMITTEE	26884	27491	570	965						YES	5/7	5/27	10/28	11/25	8/9	10/28	11/25		10/28	11/25	
NEW YORK STATE VOTER REGISTRATION DRIVE*	7	10000	7	0	10/28	11/25	4/1	4/29		N/A	N/A			YES				YES			YES
*RECOMMENDED FOR AN AUDIT ON 11/18/77																					
NON-PARTY																					
COPE COMM. AFL-CIO Greensboro, NC																				10/31	11/21
IRONWORKERS LOCAL UNION NO. 25 Pol. Educ. Comm.																				10/31	11/21

Memorandum

To: Bill Oldaker
From: Bill Loughrey B.L.
Re: 1977 Nonfilers
Date: January 16, 1978

After discussions with the team chiefs and John Gibson, I would recommend filing suit against the following committees:

John Hemenway for Congress Committee (also will be recommended for audit)
Sportsmen for Kentucky
Taxpayers Action Fund
United Nations Reform Electoral Campaign Committee
Genesee County Republican Finance Committee

I would not recommend action against the other candidates and committees, although you may wish to proceed against some or all of them. Also, since some of these candidates and committee are in the process of filing reports, please check further with the Reports Analysis Division before any recommendation to the Commission. Even if the above five committees do file, I would suggest the filing of a suit for late filing.

I agree with Bill's observation above but would add the thought that we might want to proceed against others who had disclosed activity in excess of \$10,000 (or comparable threshold) on the theory that they might again be candidates in 1978—
O.B.P.

80040224294

3 0 0 4 0 3 2 4 2 9 5
NEWS FROM...

FEDERAL ELECTION COMMISSION



1325 K Street, N.W., Washington, D.C. 20463

RELEASE: ON RECEIPT
Monday, January 9, 1978

CONTACT: DAVID FISKE
SUSAN TIFFT
(202) 523-4065

FEC PUBLISHES LIST OF 1977 "NON-FILERS"

WASHINGTON - January 9 - The Federal Election Commission today published the names of Federal candidates, their principal campaign committees, and other political committees which failed to file required reports of their campaign finances during 1977.

NOTE: The list of 1977 "Non-Filers" appears on the back of this page.

During 1977, candidates and their authorized committees were required to file a 1976 year-end report, due January 31, 1977, if their receipts or expenditures in the fourth quarter exceeded \$1,000 or if they had any debts outstanding on December 31, 1976. Candidates and their authorized committees had a requirement to file 1977 quarterly reports (April 10, July 10, and October 10) if their combined total of receipts and expenditures exceeded \$5,000 in a calendar quarter. All other political committees must file a 1976 year-end report and the required 1977 quarterly reports if they raised or spent over \$1,000 in the calendar quarter.

Candidates and committees which are exempt from filing a quarterly report must nevertheless notify the Commission of this fact by letter or FEC Form 3a postcard at the end of the first quarter in which the exemption applies.

The Federal Election Campaign Act of 1971, as amended in 1974 and 1976, states that "it shall be the duty of the Commission to...prepare and publish from time to time special reports listing those candidates...for whom...reports were not filed as so required."

Under FEC procedures, three notices are sent to the candidates and committees reminding them of their reporting obligations, and urging compliance. If a report is not filed following these notices, the names of all "non-filers" are made public.

"Prior notice" is the first reminder sent on a routine basis prior to the filing date, to all candidates on election ballots in their respective states, as certified by their Secretary of State, and confirmed by lists with the Clerk of the House and the Secretary of the Senate and to all other candidates and political committees registered with the Commission. This notice simply reminds candidates and committees of their required reports, and the appropriate filing dates.

The second notice is sent only to candidates and committees whose reports have not been received by or shortly after the filing date, and states that this "apparent failure...gives the Commission 'reason to believe' that the candidate or committee is in violation of the reporting requirements."

The third notice is sent only to candidates and committees whose reports are not filed in response to the second notice, and states that "continued failure to file has given the Commission 'reasonable cause to believe' that they are in violation and that 'failure to respond may subject the candidate or committee to civil penalties and...to publication of the candidate's or committee's name on a list of non-filers.'"

When a candidate or committee continues to fail to file after receiving the three notices, the Commission publishes the name of the candidate and/or committee on a list of non-filers.

In addition to publishing the names of non-filers, the FEC has the authority to undertake further enforcement action under the statute, including civil court enforcement and imposition of civil fines (\$5,000 for "any violation" and \$10,000 for a "knowing and willful violation.")

The following are the candidates, principal campaign committees and political committees which failed to file required reports during 1977: (X denotes that a report was not filed.)

FILING ENTITY	Year-End '76 (1-31-77)	Apr. 10 1977	Jul. 10 1977	Oct. 10 1977
<u>PRESIDENTIAL</u>				
College Students for Reagan (Independent Expenditure Committee) (New York, New York)	X	X	X	X
Citizens for Responsible Action (Independent Expenditure Committee) (Corpus Christi, Texas)	X	X	X	X
<u>SENATE</u>				
Becan for Senate (Nevada)	X	X	X	X
Dan Becan (Nevada)		X	X	X
Gifford for U. S. Senate (California)		X	X	X
Howard Gifford (California)		X	X	X
Thurman Hamlin (Kentucky)				X
Trenton H. Parker Senate Campaign Comm. Inc. (Colorado)				X
Tierney for U.S. Senate Committee (Montana)	X	X	X	X
<u>HOUSE</u>				
Allen Blume for Congress Committee (Alaska-at-Large)				X
Bill Brown for Congress Campaign Committee (Florida-12th)			X	X
Bouay for Congress (California-6th)		X	X	X
Citizens for Dennerll Committee (Ohio-20th)		X	X	X
Citizens for Grimm (New York-37th)		X	X	X
Citizens to Elect Campenni (New Jersey-14th)		X	X	X
Committee Amigos De Jaime Benitez (Puerto Rico-Cayey) (candidate/committee mix)		X	X	X
Committee to Elect Bruce Latta (California-26th)		X	X	X
Committee to Elect Charles G. Johns (Michigan-8th)		X	X	X
Committee to Elect Harry A. Hanna (Ohio-22nd)		X	X	X
Committee to Elect Hill to Congress (W. Virginia-3rd)		X	X	X
Committee to Elect Karl T. Untch (Ohio-19th)		X	X	X
Committee to Elect Robert M. Reynolds (Washington-6th)		X	X	X
Committee to Elect Robert Sieburg '76 (N. Carolina-9th)		X	X	X
Franke For Congress (Ohio-7th)		X	X	X
Jessie Rattley for Congress (Virginia-1st)		X	X	X
Jim Howard for Congress Committee (Oregon-4th)		X		
John Hemenway for Congress Committee (Washington-7th)				X
Rebyn Hickey for U.S. Congress (California-27th)		X	X	X
Schia for Congress (Pennsylvania-3rd)		X	X	X
Spirit of 76 Campaign (Georgia-9th)		X	X	X
Stout for Congress (Indiana-5th)		X	X	X
Robert Reynolds (Washington-6th)		X	X	X
<u>PARTY</u>				
Genesec County Republican Finance Committee (Flint, Michigan)		X	X	X
New York State Voter Registration Drive (Springvalley, New York)	X			
<u>NON-PARTY</u>				
Sportsmen for Kentucky (Louisville, Kentucky)	X			
Taxpayers Action Fund (Washington, D.C.)	X	X	X	X
United Nations Reform Electoral Campaign Committee (Raleigh, N.C.)	X			
COPE Committee AFL-CIO, (Greensboro, N.C.)				X
Ironworkers Local Union No. 25, Political Education Committee (Detroit, Michigan)				X

COMITTEE AMIGOS DE JAIME BENITEZ

1ST NOTICE

2ND NOTICE

4159 Benitez

PS Form 3811, Nov. 1977

● **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:
Jose Alayon

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 498363

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Address Authorized agent
Monique Fernandez

4. DATE OF DELIVERY
 11-1-77

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

NOV 1 1977

80P-100-2

4159/2

PS Form 3811, Nov. 1977

● **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. 15¢
 Show to whom, date, & address of delivery. 35¢
 RESTRICTED DELIVERY. Show to whom and date delivered. 65¢
 RESTRICTED DELIVERY. Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Jose C. Alayon

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 913221

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Address Authorized agent
REP Alayon

4. DATE OF DELIVERY
 11-29-77

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

NOV 29 1977

80P-100-2

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COMMITTEE AMIGOS DE JAIME BENITEZ

1st Notice

2nd Notice

Unaccounted For

Multiple Notice

80040224298



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 505

Date Filmed 11-25-80 Camera No. --- 2

Cameraman GPC

66110101